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HUNGER AMONG THE HOMELESS: A SURVEY OF 140 SHELTERS, FOOD STAMP PARTICIPATION AND RECOMMENDATIONS

SELECT COMMITTEE ON HUNGER
U.S. HOUSE OF REPRESENTATIVES

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LETTER OF TRANSMITTAL

To: Members of the Select Committee on Hunger
From: Mickey Leland, Chairman

I am pleased to transmit to Committee Members the enclosed Committee Report "Hunger Among the Homeless: A Survey of 140 Shelters, Food Stamp Participation and Recommendations." I would like to thank the staffs of the National Board at the Emergency Food and Shelter Program, regional offices of the Salvation Army, and the National Coalition for the Homeless for their assistance in reviewing the survey and for distributing the survey questionnaires. I would also like to thank the Congressional Research Service and the House Information Service for their technical guidance in the design and analysis of the survey results.

This report is the first compilation of research on hunger among the homeless, including data from a Committee survey assessing the views of 140 shelter managers from across the Nation—who work closely with the homeless each day—on the food assistance and long-term needs of the homeless. I believe this new information will provide guidance to the Congress, State and local governments, and the private sector in shaping policy that can eliminate hunger among the homeless and prevent additional homelessness.

Sincerely,

MICKEY LELAND,
Chairman.

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INTRODUCTION

The Select Committee on Hunger has studied the causes and consequences of hunger among Americans in poverty and at-risk of hunger. Through hearings and reports the Committee has focused on vulnerable groups within the poverty population. No group has more specific problems in terms of access to food than the homeless.

The need for an examination of solutions to hunger among the homeless is critical. According to major national, state and local reports on homelessness, over the last few years the number of persons having no stable shelter has reached crisis proportions and is continuing to increase. At the same time, the private sector—the primary source of food for the homeless—has not been able to keep up with the demand for food assistance among those who do not have resources to buy food.

Hunger among the homeless is an issue that has repeatedly surfaced during Committee hearings and research.(1) At site visits to private voluntary feeding establishments in San Francisco and Houston Members consistently heard from service providers of the increasing number of homeless persons in need of emergency food assistance. The first Committee hearing which specifically addressed this subject, "Socioeconomic Factors Associated with Hunger and Poverty in Urban America," was held on November 8, 1985 in Brooklyn, N.Y. Several witnesses testified on the causes of hunger among the homeless. At that time, the Committee also conducted a site visit to the food assistance center at the Brooklyn Arms Hotel serving homeless families.

On March 6, 1986, the Committee expanded its investigation of homelessness with a hearing entitled "Hunger Among the Homeless." Testimony revealed the specific food assistance needs of the homeless and resulted in legislative recommendations to the Committee.

To gain information directly from service providers on the causes and solutions to hunger among the homeless the Committee sought out the opinions of shelter managers on these issues. In the Spring of 1986 the Committee surveyed managers of individual shelters across the Nation on their ideas concerning the food assistance needs of the homeless and the barriers to participation in the Food Stamp Program for their shelter residents. (See Appendix A for copy of survey.)

This report, a follow-up to the Committee's hearings, is the first compilation of information on the food assistance needs and food stamp participation of the homeless. The findings are based primarily on data from the research literature, Committee hearings, with supportive data from the survey responses. Also included are findings from a survey mailed to shelter providers across the country and a telephone survey of nine metropolitan housing authori-

ties on their waiting lists for federally subsidized public housing (See Appendix C).

The shelter provider survey is based on questionnaires, designed in consultation with the Congressional Research Service, sent by the Committee to three umbrella agencies coordinating programs for the homeless: the Emergency Food and Shelter National Board Program, regional offices of the Salvation Army, and the National Coalition for the homeless. These agencies then distributed copies of the questionnaire to a broad range of shelter providers who are associated with the national offices. By July 1, 1986 the Committee had received 140 completed questionnaires. The responses came from shelter managers in 24 States and 72 Congressional Districts (see Appendix B), who report serving a total of 7,663 homeless persons at full capacity. Responses to these questionnaires were analyzed with the computer assistance of the House Information Service.

The report addresses these major questions:

1. What are the primary sources of food for the homeless?
2. What are the extent and limitations of the private sector's efforts to feed the homeless?
3. What role do Federal programs assume in providing food assistance for the homeless?
4. How accessible and/or effective is the Food Stamp Program for the eligible homeless and what are the barriers to participation?
5. What Federal, State, and local efforts have been and can be made to improve the accessibility and effectiveness of the Food Stamp Program—the Nation's major Federal food assistance program—for the eligible homeless?
6. What actions should be taken by the public and private sectors to alleviate the underlying cause of hunger and its health consequences among the homeless?

The Committee recognizes that food assistance alone is not the solution to the problems of the homeless. While the severe economic, psychological and physical problems associated with homelessness must also be addressed, access to an adequate diet is an emergency need that must be acted on immediately.

SURVEY DATA

The data analyzed from the Committee's questionnaires are from the 140 completed responses to the Committee survey. These shelters serve 7,663 homeless persons daily (at full capacity). Represented in the group of respondents are a variety of shelters and homeless populations: shelters serving individual adults and those families; large, medium, and small sized shelters; and shelters from all regions of the Nation.

The 140 responding shelter providers offered the Committee a widespread view of the problems and difficulties faced by shelters in serving the needs of the homeless and of the difficulties faced by the homeless in obtaining their basic food needs. The results derived from the 140 questionnaires, while not intended to be a repre-

sentative sample [1] of all homeless shelters, confirm the findings in numerous state and local studies and testimony regarding the problems faced by the homeless.

The results of the survey, therefore, may overestimate the ability of shelters nationwide to provide direct food assistance for the homeless. Shelter managers who voluntarily took time to complete and mail the questionnaires likely have greater than average administrative capacities both in volunteer and operating resources. Hence, the respondents to the Committee's survey may provide more direct food assistance than the majority of shelters across the Nation; and they may have more information on the food assistance needs of their clients than those shelters who have very little administrative capacity.

Further, it must be noted that this survey represents information on homeless persons at the shelters on the day the questionnaires were completed (during Spring of 1986) and thus may not represent the severity and nature of the food assistance problems experienced by homeless persons throughout the year. Because we have collected information from shelter providers there are no data on the characteristics and food assistance needs of homeless persons who are not in shelters. These individuals may have greater food and other emergency needs as well as a much lower participation rate in food assistance programs.

The responses were analyzed both quantitatively and qualitatively to examine: the causes and consequences of hunger among the homeless, their food assistance needs and food stamp participation rates; and, recommendations for improving the accessibility and utility of the Food Stamp Program for the homeless.

Where percentages are cited on the survey responses these are a computed proportion of the shelters responding to the specific question under analysis. In cases when all shelter providers have not responded to a particular question the number of actual respondents is noted next to the percentage. The analysis was conducted for all 140 shelters and for groups of shelters of particular interest (such as large or small shelters, shelters serving less than two main meals daily or shelters serving no meals, shelters serving families or those serving individuals only).

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[1] The choice of methodology for distributing the questionnaires (described in the introduction) was not intended to provide a statistically significant probability sample. Because there is no available data on the number of homeless shelters nationwide such a sample can not be drawn. More importantly, the responses to the Committee questionnaires, designed to collect specific and practical information on the food aid needs of the homeless, should be viewed as testimony from a large and diverse group of shelter providers corroborating the findings of the existing literature.

Major Findings From Shelter Provider Survey

I. PRIMARY SOURCES OF FOOD FOR THE HOMELESS

Eighty-one percent (81%) of shelter providers state that the private sector meals at shelters are a primary source of food for homeless persons; yet most (52%) shelters do not provide two main meals daily.[1] Typically, the homeless must seek out food in soup kitchens when they are accessible, from dumpsters, and other free food sites.

Dumpsters are cited as a primary source of food for the homeless by nine percent (9%) of shelter providers.

II. LARGE PERCENTAGE OF HOMELESS NOT RECEIVING FOOD STAMPS

Forty-five percent (45%) of the total number of homeless persons identified as eligible for food stamps (1,678 out of 3,751) were reported not to be receiving benefits.

Among the homeless in family shelters, forty-nine percent (49%) of those identified as eligible (1,028 out of 2,112) were reported not to be receiving food stamps.

In shelters with no one available to assist in the food stamp application process, fifty-eight (58%) of the homeless identified as eligible were reported not to be receiving food stamps (255 out of 440).

III. ADMINISTRATIVE BARRIERS TO FOOD STAMP PARTICIPATION

Twenty-one percent (21%) of all shelter providers reported their homeless residents are denied eligibility for food stamps because they do not have a permanent address or are sleeping outside.

Sixty-seven percent (67%) of responding shelter providers (60 out of 90) reported their homeless residents experience lengthy delays in between applying for food stamps and receipt of benefits.

Documentation problems were the greatest single reported barrier to participation in the Food Stamp Program for eligible homeless. Twenty-five percent (25%) of shelters reporting lengthy delays (13 out of 53) cited inadequate documentation as the cause. For fourteen percent (14%) of all shelters, inadequate documentation was not only a barrier or a cause of lengthy delay, but was reported to result in denial of food stamps for eligible homeless persons.

The need for increased assistance to the homeless in applying for food stamps and the use of more shelter providers as collateral contacts in the application process is supported by the survey findings of administrative barriers to food stamp participation.

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[1] For the purpose of this report "two main meals" are defined as lunch and dinner which generally provide at least one-half an individual's daily nutrient requirements.

IV. SHELTER PROVIDERS APPROVE USE OF FOOD STAMPS BY HOMELESS FOR PREPARED MEALS AT SOUP KITCHENS AND/OR SHELTERS

Sixty-five percent (65%) of all responding shelter providers would like to see the utility of food stamps for the homeless improved by allowing them to purchase or contribute to the cost of prepared meals at shelters and/or soup kitchens with food stamps—as recently authorized in Public Law 99-570, the Omnibus Drug Enforcement, Education and Control Act (enacted October 27, 1986). The providers support this change in law primarily because they believe it would greatly improve both the quality and quantity of food assistance available to the homeless.

Moreover, many providers state that this change in statute can remove another "barrier" to food stamp participation in some areas. By allowing shelters to be certified as institutions eligible to accept food stamps, the food stamp rule denying eligibility to institutional residents will be lifted for homeless persons in certified shelters.

V. HUNGER RELATED HEALTH PROBLEMS REPORTED AMONG SHELTER RESIDENTS

Hunger related health problems reported among the homeless include: anemia, infectious diseases, low birthweight, chronic diseases requiring special diets (hypertension and diabetes), lack of infant formula, and children appearing physically underdeveloped for their age. (These reports of health problems by nonmedical shelter providers parallel the findings of many published medical reports on the health problems of the homeless.)

CHAPTER I: BACKGROUND

While the American public recognizes the existence of a large homeless population, according to a January 1986 CBS News/New York Times Poll 59 percent of U.S. adults are mainly familiar with homelessness as a phenomenon they have "seen on television or read about."(2) Because most Americans have had no personal experience with homelessness, it is important to discuss the extent and multiple causes of the problem, the true faces of homeless people, and their extreme vulnerability to hunger and its negative health consequences.

A. HOMELESSNESS DEFINED

Any assessment of the extent of homelessness depends on a definition of the population. The National Governors' Association defines a homeless person as "an undomiciled person who is unable to secure permanent and stable housing without special assistance."(3) The U.S. General Accounting Office defines homeless individuals as "those persons who lack resources and community ties necessary to provide for their own adequate shelter."(4) These complementary definitions portray the persons whose food assistance needs are the focus of this report.

B. WHO ARE THE HOMELESS?

The U.S. Department of Health and Human Services (DHHS) estimates the average homeless person is in his/her mid/thirties—much younger than in the past when the average was in the mid-fifties; between 15 and 25 percent are women, a percentage that is increasing; between 40 and 50 percent are minorities; and 20 to 30 percent are family groups.(5) While a certain proportion of the homeless have mental or other behavioral problems that distinguish them from the rest of the poor in America, recent research reveals that homelessness is endemic among the same groups of people for whom poverty and unemployment are also endemic.(6)

Parallel to a dramatic increase in poverty since 1979 among children, particularly minority children, is the new face of the homeless—the face of the vulnerable child. According to the U.S. Conference of Mayors survey of 25 major cities, in 1986 alone there was an average increase of 22 percent in the number of families seeking emergency shelter. They report that families now comprise 28 percent of the homeless population. In New York City, families with children comprise 76 percent of the homeless. In Philadelphia, Trenton, and Yonkers they constitute 50 percent.(7) A growing proportion are very young children. In a study conducted last summer of Boston's shelters for homeless families, it was documented that two-thirds of homeless children were under five years old.(8) Robert Hayes, legal counsel for the National Coalition for the homeless,

commenting in his testimony on the tragedy of this trend stated: "Homelessness is becoming a children's disaster."

Veterans of Vietnam or earlier wars are believed to make up a large percentage of the homeless population around the country. In eight areas surveyed by the National Coalition for the Homeless (Baltimore, Detroit, Los Angeles, Milwaukee, New York City, Phoenix, San Francisco, and the State of Ohio), veterans are estimated to comprise at least 28 percent of the homeless population.(9)

C. HOW MANY ARE HOMELESS?

There are no accurate data on the number of homeless individuals and families living in this country. Even the most comprehensive attempt to estimate the number of homeless, prepared by the U.S. Department of Housing and Urban Development (HUD) in 1984, has come under attack as a gross underestimation because of flawed methodology. The HUD report estimated the number of homeless in 1983 to range from 250,000 to 350,000.(10) A variety of private sector groups working with the homeless have estimated the number of homeless to be between 2 and 3 million on any given day or night.(11)

While there is disagreement on the exact number of homeless, there is consensus that the numbers are very large and continuing to grow. Since 1983 the U.S. Conference of Mayors has reported a dramatic annual increase in the demand for emergency shelter.(12) The National Bureau of Economic Research reported that the homeless population was 23 to 30 percent larger in 1985 than in 1983, "with the number of homeless families growing especially rapidly."(13) In 1986, the U.S. Conference of Mayors surveyed 25 cities and found in every survey city save one the demand for emergency shelter increased during that year; the average increase was 20 percent.(14)

The growth in the number of homeless continues to outpace the availability of shelter beds. According to a 1986 report by Partnership for the Homeless (based on a survey of 400 public and private sector agencies serving the homeless in 60 of the Nation's largest metropolitan areas) three out of every four homeless persons, including children, did not have a shelter bed available on any one night during last winter. Further, Partnership determined the gap between the number of homeless seeking shelter and the beds available is continuing to widen.(15)

The U.S. Conference of Mayors 1986 report on homelessness, corroborates these findings of unmet need. In 72 percent of the cities surveyed, emergency shelters have to turn away people in need because of lack of resources. In Nashville, for example, "approximately 255 individuals and 178 to 182 families are turned away from services each month." In Kansas City families who were turned away had to "sleep in cars, abandoned buildings or, in some cases, split themselves into smaller units to be accepted by facilities which handle single adults or smaller family units."

D. MAJOR CAUSES OF HOMELESSNESS

The January 1986 CBS/New York Times poll, reveals the tendency of the public to stereotype the homeless as alcoholics and drug

addicts. Contrary to this stereotype, the homeless today are in actuality a heterogeneous population. Of the homeless counted by HUD in 1983, it was stated that only approximately one-half of the homeless were substance abusers and/or mentally ill.(16)

While it is valid to recognize the deinstitutionalization movement of the 1960's along with the lack of community mental health support services as increasing the number of chronically mentally ill homeless, the General Accounting Office concludes that a new homeless population has emerged in the 1980's: "those who have lost their jobs or public assistance, lost their residences, and were subsequently unable to find affordable housing."(17)

Many factors have been postulated to account for the rise of the new homeless. The National Bureau of Economic Research finds that the recent increase in homelessness can not be attributed primarily to deinstitutionalization. Rather, the Bureau notes: "It is, in our view, the concordance of increased poverty and income inequality with housing market developments deleterious to the poor that best explains why the at-risk population suffered" increased homelessness in the 1980's.(18)

According to the U.S. Department of Labor's Bureau of Labor Statistics, nationally the average "renters' residential costs" increased 38 percent between 1980 and 1985.(19) In urban areas the number of rental units available in the price range of a family below the poverty line has fallen dramatically; the poverty population, in contrast, has increased by 7 million persons from 1979 to 1985—a 27 percent increase.(20)

In June 1986, the Select Committee on Hunger surveyed nine metropolitan housing authorities in nine major cities with large homeless populations (Boston, Chicago, Houston, Los Angeles, New York, Philadelphia, San Francisco, Seattle, and Washington, D.C.). The results of the survey indicate there were a total of more than 321,455 households on waiting lists for public housing in these nine cities (Appendix C). In cities such as Seattle, WA the waiting lists for public housing are so long, applications are no longer being accepted. These very large waiting lists for public housing reflect the limited HUD assisted low-income housing available to prevent additional homelessness or to provide permanent housing for those who are already homeless.

E. WHERE ARE THE HOMELESS?

1. In Shelters and on the Streets

The homeless who are fortunate enough to live in areas with shelters, must seek out a shelter bed among the limited available emergency shelter in their city or community. For those individuals and families who fall in the gap between the number of shelter beds available and the number of homeless persons, the streets may be the only option available.

Witnesses before the Select Committee on Hunger, the House Subcommittee on Housing and Community Development of the Committee on Banking, Finance and Urban Affairs, and the House Subcommittee on Intergovernmental Relations and Human Resources of the Committee on Government Operations have described the variety of makeshift dwellings resorted to by today's

urban homeless, including: cars turned into mobile homes; hovels strung-up under interstate bridges; cardboard boxes perched on park benches; public parks; bus and train depots, abandoned buildings, and steam vents.(21)

2. Hidden Homeless

Over and above the visible homeless, are the growing number of hidden homeless—those poor families living doubled or tripled up with friends or relatives. An estimated 40 percent of 1.3 million available public housing units nationwide are housing two or more families per unit.(22) In 1984, in New York State alone more than 143,000 poor families were "doubled-up" in the homes of other people. At least 4,000 such families were living three to a unit or more.(23)

According to the New York State Department of Social Services, homeless families such as those seen in emergency shelters, sleeping in welfare offices and on the streets, are in many cases at the last stage of a process of homelessness. They report that the homelessness visible to the public "begins in a crowded unit where two or more families share space for a time, until tension and inconvenience force the secondary tenants to move on."(24)

The tragic situation of children in hidden homeless families was expressed by a homeless mother during a Committee field visit to the "Pitts Hotel," a shelter for homeless families in Washington, D.C. The mother told Committee members that before coming to the shelter, she would take her two children and sleep at different peoples' homes so that her children would have a place to be warm, a place to lay their heads.

3. Urban, Suburban and Rural Homeless

While the great majority of the homeless are in large metroplitan areas, homelessness today is not restricted to large cities. Many small cities are now being forced to open emergency shelters.(25) Similarly, homelessness is affecting suburban communities. For example, a recent report revealed thousands of homeless persons in Nassau County, one of New York City's most affluent suburbs.(26)

Because rural communities generally do not contain public gathering places for the homeless, such as parks or shelters, the rural homeless are not as dramatically visible as those in urban areas. Yet the problem of homelessness in rural America is also growing. The Housing Assistance Council has documented homelessness and a lack of emergency shelter in rural areas across the Nation:(27)

—In southeastern Georgia there were families living in small towns whose homes had been condemned as substandard and who had no relocation assistance;

—In West Virginia, mobile home park tenants were homeless because they were unemployed and not able to continue paying their rent;

—In Humboldt County, California social service providers report incidences of families living in cars and under bridges to be a constant occurrence.

—In southwestern New Mexico there is only the civil defense shelter located in the local courthouse for the growing number of newly unemployed who face homelessness due to foreclo-

sures. Some families in the community occasionally provide temporary shelter in their own houses.

Homelessness is also reported to be a serious and growing problem for migrant farmworkers and their families. Testimony by the secretary of the Virginia State Department of Human Resources, Eva S. Teig, presented at the Committee's hearing on "Hunger Among Migrant and Seasonal Farmworkers" revealed a housing shortage for migrant farmworkers on the Eastern Shore of Virginia, particularly because small farmers do not construct adequate housing to shelter their workers. According to the secretary and other witnesses who work with migrants in the Midwest and Southeast, families have been found sleeping in cars, grain silos, or outside migrant labor camps without any form of shelter.(28)

F. VULNERABILITY TO HUNGER

While the problems of the homeless are complex and an array of solutions is needed, individuals who are homeless and living in poverty daily face the threat of hunger and require immediate food assistance. Before examining solutions to the problem it is important to understand why the homeless are particularly vulnerable to hunger.

1. Environment

Persons who are homeless are exposed to the extremes of weather and/or infectious diseases. As a result of hunger, they can be susceptible to a never ending cycle of infectious diseases which in turn create increased nutritional needs and vulnerability to hunger.

2. Age and Physical Conditions

Adequate food and/or prepared meals are critical for the well being and survival of homeless persons of all ages. The growing proportion of homeless who are young children are most vulnerable to hunger. Even short-term periods of hunger can cause physical or mental disabilities for a growing child. The health and survival of homeless pregnant women and adults with chronic diseases are also at-risk when these individuals do not get enough to eat.

3. Nonparticipation in Public Assistance Programs

According to the U.S. Department of Health and Human Services' Internal Task Force on Food and Shelter, many homeless are eligible for Federal and State cash or in-kind benefits, but have difficulty accessing these benefits. Sixty to 80 percent of the homeless do not receive any form of nonfood public assistance.(29) Hence, according to the task force's estimates, a considerable majority of the homeless do not participate in the programs which could provide resources needed to buy food.

4. Lack of Stable Shelter

The homeless are also vulnerable to hunger because they most often do not know where they will be able to rest from night to night and have no daytime shelter. As a result, they have no place to store their belongings, including food supplies, and no place to

prepare meals. One survey respondent explained the vulnerability of the homeless to hunger as follows:

> Homeless families and individuals do not eat regularly. Most of the time they can only buy food which does not require cooking and does not contain proper nutrients. They are not able to eat any hot meals. After a few days of eating cold food people seem to be depressed * * *

5. Private Sector Cannot Meet the Increased Demand

The private sector is the major funding source for shelters and food services available to the homeless. Meals at these sites, according to our survey responses and the research literature, are the primary sources of food for the homeless. However, in some communities there is no private emergency food assistance for the homeless. In Ohio, for example, 13.4 percent of shelter providers surveyed by the State Department of Mental Health reported no soup kitchens are available to feed the homeless.(30)

Moreover, in urban communities, where soup kitchens can usually be found, the demand is much greater than the private sector can fulfill. The U.S. Conference of Mayors reports that an average of 23 percent of the demand for emergency food assistance went unmet during 1986 in the 25 cities surveyed, up significantly from 1985. In some cities the food assistance shortage is worse: Trenton reported 75 percent and Denver reported 40–45 percent of the demand went unmet.(31)

Shelter directors also state they are unable to meet the demand for food assistance or emergency shelter among the homeless in their communities. In the Select Committee's survey, 86 percent of the 107 shelter providers responding to this issue stated that private funds are insufficient to serve the increasing demand for food and shelter in their communities. Several shelter providers specifically noted private funds are insufficient, even now, to meet the demand. A few reported having to routinely turn away homeless persons who seek their services.

6. Private Sector Does Not Provide Sufficient Quantity or Quality Meals

While homeless persons are primarily dependent on the charity of shelters and soup kitchens for prepared meals (as the shelter providers responding to the Committee's survey confirm), most shelters do not provide the homeless with two main meals daily or cooking facilities to prepare their own food. Typically, the shelters must leave the provision of meals up to the homeless individuals who seek out food in soup kitchens when they are accessible, from dumpsters, and other free food sites.

One shelter provider explains the importance of expanded food service at shelters so that the homeless can focus their daily efforts on more than subsistence as follows:

> If a person/family is spending several hours a day waiting in soup kitchen lines or attempting to find food outside the shelter, they cannot focus on their housing problem as efficiently.

If a homeless person is able to get a soup kitchen meal, he or she is still not provided with the basic recommended nutrition required for promoting health. Veronica Maz, the director of Martha's Table, which operates a soup kitchen for poor children and a

mobile food delivery van for the homeless on the streets in the Washington, D.C. area, testified on the plight of the homeless in search of food and the inadequate nutrition soup kitchens are able to provide:

> If you are homeless today, a street person, you can always find something to eat. You can go to shelters. You can go to soup kitchens. You can go to garbage cans. You can go to dumpsters * * * most often what a person will find is a meal consisting of starches—macaroni and cheese, beans or rice. This is hardly a balanced or nutritional meal.

Even for those who are living in shelter facilities, Myron Winick, Professor of Nutrition at Columbia University, New York, has reported that the food provided by private nonprofit organizations he visited in New York City is not adequate to meet the needs of children or those with special nutritional needs—the elderly, those with chronic diseases, and alcoholics. Professor Winick documented deficiencies in calories, calcium, iron, vitamins and minerals at these meal sites.(32)

The results of a survey of shelter providers in Boston confirm Professor Winick's findings. Project Bread, an information and referral center on food and hunger issues in eastern Massachusetts, surveyed six Boston shelters providing meals. Nutritionists analyzing the quantity and types of foods served calculated a deficiency in milk and milk products (the primary food source of calcium) and fruit, fruit juices and fresh vegetables (the primary food source of essential vitamins). Additionally, the survey found shelters are unable to adequately accommodate special diets, such as those required for some older adults or persons with chronic diseases such as high blood pressure and diabetes.(33)

G. HUNGER RELATED HEALTH CONDITIONS AMONG THE HOMELESS

Though research on the health status of the homeless is limited, existing studies have documented high rates of health problems associated with hunger among homeless pregnant women, infants and children.

1. Pregnant Women and Infants

Infants born to homeless women face a greater chance of severe health problems or early death due to inadequate prenatal care and diets which are nutritionally inadequate. The New York City Department of Health reported more than one-half of all pregnant mothers living in their "welfare hotels" had minimal or no prenatal care, which implies minimal or no nutritional care, during their pregnancy.(34)

The birth and death statistics in New York City reveal there are severe consequences of inadequate prenatal health and nutrition care, for the homeless. One out of six (16.3 percent) of the homeless infants born to mothers living in welfare hotels from January 1982 to June 1984, were low birthweight. This is over two times the low birthweight rate of 7.4 percent for infants born to all other mothers in the city (excluding those living in low-income housing projects who were not studied in the comparison group) during the same period. The infant mortality rate of 24.9 (per 1,000 live births) for infants born to homeless mothers living in welfare hotels was more

than double the infant mortality rate of 12.0 (per 1,000 live births) for all others.

Homeless infants who survive are vulnerable to hunger and related disease due to the lack of sanitary conditions needed to assure an adequate quantity and safe supply of infant formula or supplemental foods. In testimony before the District of Columbia Commission on Homelessness, Lois Smith, a registered nurse serving homeless families at the Community of Hope Health Center in Washington, D.C., describes a case of hunger for a homeless infant seen at her clinic:(35)

> • • • the mother tried to comfort the two older children who were crying and tried to feed a bottle of milk to the infant who was rejecting the bottle, but also acting very hungry.
>
> One of our nurses offered to take the baby and feed it. Thinking that perhaps the nipple was blocked, she checked it and found that the milk was sour. When she mentioned this to the mother, the woman burst into tears and stated, "I don't know what to do. I have to go out and look for housing and I have no place to keep the milk during the day. I have to carry it with me and in this hot weather it goes sour before the day is over."

2. Children

A study of 110 homeless children seen by physicians at the Department of Community Medicine at St. Vincents Hospital, New York City, revealed these children have poor health status, causing them to become vulnerable to undernutrition and hunger. Of the homeless children surveyed 25 percent were anemic; 5 percent suffered from serious growth failure; 50 percent had recurrent respiratory infections, and 29 percent had ear infections.(36) It should be noted that these hunger related health statistics may underestimate the extent of health problems among homeless children because the data were collected only on children in homeless families who were able to get to the clinic.

3. Persons with Chronic Disease

Elderly and middle-aged homeless adults are particularly vulnerable to the health consequences of hunger if they suffer from chronic disease or repeated infections. According to a study of 6,000 homeless persons conducted by the Department of Community Medicine at St. Vincent's Hospital, New York City, among the most common health conditions among the homeless are respiratory and skin infections. Compared to the national population, the study found the rate of pulmonary tuberculosis among the homeless to be particularly high.(37)

As one of its first manifestations, protein-calorie malnutrition will increase an individual's susceptibility to infection. Thus, infection, which has been reported to be very common among the homeless, could be a consequence of, and/or aggravated by, inadequate food intake.

The incidence of high blood pressure among the homeless surveyed by St. Vincent's Hospital is also very high. A lack of nutritious meals can adversely affect the health of those homeless with high blood pressure and bring upon high blood pressure for those already at high risk.

H. FEDERAL PROGRAMS PROVIDING FOOD ASSISTANCE FOR THE HOMELESS

The following Federal food programs are potential, though limited, sources of food assistance for the homeless. Only a limited amount of funds from the Emergency Food and Shelter Program are targeted specifically for food assistance to the homeless.

1. Emergency Assistance Programs

(a) The Emergency Food and Shelter Program.—The Federal Emergency Management Administration (FEMA) administers this program through a national board of charities responsible for the distribution of funds ($120 million in fiscal year 1986) to localities with high poverty and unemployment rates. Funds are divided among approximately 1,300 localities with about 60 percent ($42 million) distributed for food to date.

(b) Emergency Assistance to Families.—Twenty-eight States and jurisdictions operate a component of the Aid to Families with Dependent Children Program (AFDC) for Emergency Assistance (EA) to serve the emergency needs when a crisis—such as homelessness—occurs. Funds go primarily to emergency services such as food, utilities, and homeless shelters. EA is a matching program, funding 50 percent of the costs of State emergency aid programs. The remaining 50 percent is the responsibility of the State.

2. U.S. Department of Agriculture Food Assistance Programs

(a) The Temporary Emergency Food Assistance Program (TEFAP).—The U.S. Department of Agriculture (USDA) donates commodities (primarily butter, cheese, and nonfat dry milk), packaged in household use sizes to States for their distribution to local agencies who provide the commodities to low-income households and individuals, some of whom may be homeless.

(b) Surplus Commodity Donations.—Commodities are also provided by USDA through State distributing agencies to charitable institutions such as hospitals, orphanages, homes for the aged, and churches operating soup kitchens which may serve the homeless.

(c) Child Nutrition Programs and the Supplemental Feeding Program for Women, Infants and Children (WIC).—The child nutrition programs such as school breakfast, school lunch, child care food, summer food and the WIC programs may provide support for homeless children and women, but there is no evidence that such support is significant.

(d) Food Stamp Program.—This program is the major Federal assistance program for low-income persons. Homeless persons who meet the income and assets eligibility criteria, and do not receive over 50 percent of their daily food from shelters are eligible for food stamp benefits. The number of homeless persons participating in the program nationwide is unknown. Homeless individuals who are eligible for food stamps may not seek benefits because they have no food preparation facilities and have not been able, to date, to purchase hot meals with the stamps. (Note that a change in the food stamp statute enacted in Public Law 99-570 will permit the homeless to voluntarily use food stamps for the purchase of prepared meals at certified nonprofit feeding establishments. The reg-

ulations for this change in law have not been finalized as of the date of publication of this report.) Thus, food stamps have had limited utility for many homeless people.(38)

The survey findings and recommendations that follow focus on the accessibility and utility of this major food assistance program for the homeless.

Chapter II: Description of Survey Sample

A. CHARACTERISTICS OF HOMELESS

The survey responses include data provided by shelter managers who serve a total of 7,663 homeless persons. Of this total, there are 715 families with 1,416 children. Nearly one in five (18 percent) of the total homeless surveyed are children, more than one in four are women (26 percent) and more than half (56 percent) are men.

B. CHARACTERISTICS OF SHELTERS

1. Type

Eighty-three of the 140 survey respondents represent homeless shelters serving families with children and 57 provide shelter for individual adults only.

2. Size

While the shelter capacity of respondents varies greatly, the majority are small- or medium-sized shelters. Fifty-five are "small shelters", serving 20 or fewer homeless persons nightly; 58 are "medium shelters," serving 21 to 50 persons; and 27 percent are large (serving 50–100) or very large (serving over 100).

3. Age

When asked how long their shelter had been operating, ninety-five (68 perent) of the shelter providers reported they had begun operating since 1980. Forty-eight of these have been in existence only since 1984. The concentration of new shelters in the survey sample corresponds to the increasing number of private voluntary organizations nationwide who recently have opened up shelters in an attempt to provide shelter for the dramatically increasing number of homeless individuals and families.

4. Funding

Private donations are the primary source of funds for nearly two-thirds (64 percent) of the shelters. Eighty-nine percent of the responding shelter providers stated that private donations will not be sufficient to meet an increased demand for their services.

Chapter III: Sources of Food

A. MEALS SERVED

Sixty-seven shelters provide two main meals daily to their shelter guests. Forty-three shelters provide less than two main meals daily and 30 provide no meals. More than one-fourth (27 percent) of the small shelters provide no meals.

The above data demonstrate that a majority of the homeless, may not be assured of their daily nutritional needs from shelter providers. Soup kitchens are cited by 31 percent (43) as a primary food source for their homeless residents. Nine percent (12) cited dumpsters as a primary source of food for the homeless they serve. The homeless receiving less than two main meals daily from a shelter most likely do not have a consistent and dependent source of prepared meals. Hence, they may not receive a majority of their nutritional needs, particularly homeless children, adolescents and pregnant women who have greatly increased nutritional needs.

B. HOMELESS NOT RECEIVING TWO MAIN MEALS (LUNCH AND DINNER) AT SHELTER

Among the 73 shelters poviding less than two substantial meals, 66 percent (48) report that the limited meals available at the shelter are a primary source of food for residents. While the homeless in these shelters are potentially eligible for food stamps (if they meet the income and asserts criteria), only 49 percent of these shelters (36) report food stamps are serving as a primary source of food for their residents. Forty-seven percent (35) of these shelters report soup kitchens to be a primary source of food. (Note that percentages total over 100 because providers were permitted to list more than one "primary source of food" in their survey response.)

Food stamps can potentially be a primary source of food for homeless persons not receiving two main meals daily from a shelter; however, as illustrated in the following section on food stamp participation, a majority of the homeless reported to be eligible for food stamps are not receiving them.

Chapter IV: Hunger Related Health Problems Reported

As discussed earlier, the homeless are particularly vulnerable to the health conditions caused and exacerbated by hunger. They will be more affected than the general population by even short-term periods of hunger because of the increased nutritional needs they have as a result of their environmental health conditions.

The survey asked shelter providers to note hunger related health problems or special nutritional needs they were aware of among their homeless residents. Anemia and infectious diseases were noted most frequently, each by 23 of the responding shelter providers. Shelter providers also reported chronic diseases requiring special diets (such as diabetes and high blood pressure) were common among their adult residents. Low birthweight among infants were noted as a sigificant problem by nearly 15 percent of the shelters. Vitamin deficiencies, a lack of infant formula, and children appearing physically underdeveloped for their age were also noted by several family shelter providers.

CHAPTER V: FOOD STAMPS AND THE HOMELESS

A. LEGISLATIVE HISTORY

The original Food Stamp Act (Public Law 88-225, 78 stat. 203), was enacted in 1964 with the intent of expanding farm markets and improving the diet of the poor. The purpose of the legislation remains virtually unchanged since its original authorization:

> It is declared to be the policy of Congress, in order to promote the general welfare, to safeguard the health and well-being of the Nation's population by raising levels of nutrition among low-income households. Congress finds that the limited food purchasing power of low-income households contributes to hunger and malnutrition among members of such households * * *. To alleviate such hunger and malnutrition, a food stamp program is herein authorized which will permit low-income households to obtain a more nutritious diet through normal channels of trade by increasing food purchasing power for all eligible households who apply for participation. (7 U.S.C. sec. 2011 (supp. 1986))

Certainly, the homeless today are among those individuals which the Food Stamp Act was enacted to assist.

B. CLARIFICATION OF ELIGIBILITY OF HOMELESS

Although not specifically stated in food stamp legislation, most homeless persons are eligible for food stamps by meeting the income and asset eligibility criteria. Despite the statutory eligibility of the homeless for food stamp benefits, according to the Committee's survey results, the transient and unique living arrangements of the homeless necessitate clarification of their eligibility for shelter providers and food stamp workers.

1. Lack of Permanent Address and No Cooking Facilities

Food Stamp Program regulations prohibit States from denying benefits to households because they have no permanent address, do not live at one address for a fixed duration of time, or because they lack cooking facilities. In spite of this prohibition, not yet directly stated in regulations, in 1983 the President's Task Force on Food Assistance reported 19 States required food stamp applicants to have a home address in order to be eligible for food stamp benefits. The task force recommended that action be taken to ensure the eligibility of the homeless for food stamps.(39)

In February 1984, USDA sent letters to regional Food and Nutrition Service administrators instructing them to contact State Food Stamp Program administrators and emphasize that benefits can not be denied to households without a fixed address.

In an attempt to guarantee the eligibility of persons without a fixed address, The Food Security Act of 1985 includes the following statutory language:

> The State agency shall provide a method of certifying and issuing coupons to eligible households that do not reside in permanent dwellings or who do not have fixed mailing addresses. In carrying out the preceding sentence, the State agency shall

take such steps as are necessary to ensure that participation in the Food Stamp Program is limited to eligible households. (amending sec. 1529. Section 11(e)(2) of the Food Stamp Act of 1977 (7 U.S.C. 2020(e)(2), as amended by section 1525)

2. Residency in an "Institution"

If a homeless person meets the income and assets test for food stamp eligibility, but is determined to be a resident of an "institution", he or she, according to the Food Stamp Act is not eligible for benefits. Pursuant to the Code of Federal Regulations (7 CFR 273.1(e), homeless individuals "shall be considered residents of institutions when the institution provides them with the majority of their meals (over 50 percent of three meals daily) as part of the institution's normal services and the institution has not been authorized to accept coupons." Homeless women and their children who are temporarily residing in a shelter for battered women are categorically exempted from the above regulation.

In testimony submitted to the Committee, Ms. Joann Eccher, the director of Project Bread, Hunger Hotline in Boston, pointed out that the language of 7 CFR 273.1 is very weak and open to a wide range of interpretations. She further stated the interpretation of 7 CFR 273.1(e) has been incorrectly applied by regional USDA offices, and local food stamp offices resulting in the automatic determination of ineligibility for most homeless staying in shelters.

Documents submitted to the Committee from Missouri and Massachusetts support Ms. Eccher's comments. Until recently, the food stamp offices in Massachusetts and Missouri were reported to be routinely denying eligibility to homeless persons who may spend a night in a shelter serving two or more meals.

Such a routine declaration of ineligibility is an incorrect interpretation of the Federal regulations. First, there is no reasonable certainty that a homeless person will be a resident of the shelter for any length of time, or on any given night. In every city in this country surveyed by the U.S. Conference of Mayors there are less beds in homeless shelters than there are homeless in that city. Thus, just because someone is a resident of an "institution" one night, doesn't mean she or he will be a resident the following night.

Second, even though a shelter may provide a majority of the daily meals, it may not provide a majority of the nutritional needs of the homeless individual. On the one hand, 7 CFR 273.1(e) considers a person a resident of an institution if it serves the majority of three meals daily. On the other hand, the purpose of the Food Stamp Program is to provide the poor with a nutritious diet by supplementing other resources. Ms. Eccher testified that many shelters providing two "meals" daily are providing only one meal and a very light breakfast. Further, given their limited financial and volunteer resources, as well as limited access to technical assistance in meal purchasing and preparation, shelters likely have a difficult time providing consistent and nutritious diets to their residents.

Ms. Eccher further suggests that a homeless shelter was not the type of "institution" envisioned by Congress in the relevant provision of the Food Stamp Act:

The original intent of 7 CFR 273.1 was to disqualify primarily those institutionalized individuals who are somewhat restricted in their ability to enter and exit the

institution, (e.g., a discharge procedure is necessary), and whose basic needs (food and shelter) are essentially guaranteed over an extended period of time. Residents of nursing homes, public residential schools, and mental health institutions fall most readily into this category; not shelters for the homeless.

Based on the above arguments and cases of denied food stamp eligiblity, advocates in Massachusetts and Missouri have worked with State agencies administering the Food Stamp Program to clarify the cases when the homeless could be considered "residents of an institution." (See section below on case examples of State and local efforts to improve the accessibility of food stamps for the eligible homeless.)

C. PARTICIPATION RATE OF ELIGIBLE HOMELESS

In January 1985, USDA reported to the Senate, "there is no evidence available to this Department that States are currently failing to serve eligible homeless persons who apply." Secretary Bode in testimony before the Select Committee said it is not currently feasible to collect data on the percentage or number of homeless persons eligible for food stamps and receiving benefits. Hence, while this survey is not national in scope, it is the first compilation of information regarding the food stamp participation rate among the homeless reported to be eligible for the program.

The data on participation rates and eligibility of homeless persons for food stamps were provided by shelter providers who work with the homelss each day and know many of their personal life situations. These individuals offer the best available estimate of the number of eligible homeless staying in their shelters and the number of these individuals who were receiving food stamp benefits at the time of the survey.

The total percentages of participation rates by eligible homeless are most likely an overestimation of the true participation rates. Thirteen percent of the responding shelter providers underestimated the number of eligible homeless because they assumed homeless persons are ineligible for food stamps if they do not have a permanent address and or if they do not have cooking facilities.

The total number of homeless persons reported to be eligible for food stamps was 3,751. Forty-five percent, or 1,678 of the eligible homeless, were not receiving food stamps. This high rate of nonparticipation for eligible homeless is higher than the estimated nonparticipation rate for the total food stamp eligible population nationwide.

The nonparticipation rate was even higher among homeless families—2,112 homeless individuals in family shelters were reported to be eligible for food stamps, but nearly one-half (49 percent or 1,028) of these individuals were not receiving benefits.

Although homeless persons residing in shelters serving less than 50 percent of meals daily are eligible for food stamps if they meet the income and assets criteria, 44 percent (1,096 homeless persons) staying at shelters not serving lunch and dinner were not receiving food stamps.

It is noteworthy that at shelters where no one is available to assist in the food stamp application process, 58 percent of the eligible (255 out of 440) are not participating in the Food Stamp Pro-

gram. In 40 percent (8 out of 20) of these shelters none of the eligible were receiving food stamps.

D. LENGTHY DELAYS

Ms. Mary Curran, a social worker at the Community of Hope homeless family shelter in Washington, D.C., in testimony before the Select Committee, reported many homeless families must wait to receive their food stamps from 6 weeks to 2 months after initial contact with the food stamp office. She explained that during this period, the families spend their days traveling to various church organizations to get food rather than begin job training and day care for their children.

The Committee survey results confirm Ms. Curran's testimony. Sixty-seven percent (60) of the 90 shelters reporting on this question stated that the homeless experience lengthy delays in the food stamp application process.

For most food stamp applicants, the regulations require eligible applicants to be enrolled within 30 calendar days of the initial application day (7 CFR 273.2(g)(1)). Those who are "extremely needy", i.e., whose income does not exceed $100 and whose other cash resources does not exceed $150 monthly, must be issued food stamps on an expedited basis. They must receive food stamps within 5 days following the day the application was filed (7 CFR 273.2(i)(3)). A large number of the homeless—those who are destitute with little or no savings—are likely eligible for this expedited service.

In their open-ended responses many shelter providers reported it takes from 6 weeks to 60 days for homeless clients to receive food stamps. Several shelter providers reported specifically that the expedited service deadlines are not adhered to for the destitute homeless.

E. CAUSES OF NONPARTICIPATION AND LENGTHY DELAYS FOR ELIGIBLE HOMELESS

1. State or Local Offices Incorrectly Denying Eligibility to Homeless

USDA's Assistant Secretary Bode, in testimony before the Select Committee on March 6, 1986, stated:

> All States have verified that their food stamp policy manuals correctly interpret the program regulations that prevent impositions of any durational residency requirement.

However, Secretary Bode's testimony made no reference to a monitoring system for the implementation of these regulations.

Contrary to the regulatory and statutory language, noted above, which clarifies eligibility for the Food Stamp Program for those without fixed addresses, more than one in five (21 percent) of the shelter providers (30 out of 140) reported that homeless persons in shelters who apply for food stamps are denied eligibility because they do not have a permanent address or because they are sleeping outside. These determinations are clearly not in conformance with the regulations determining food stamp eligibility nor with the clarification of these regulations in the Food Security Act of 1985 (signed into law December 23, 1985).

2. Documentation Problems

Inadequate documentation by the homeless applying for food stamps was cited more often than any other factor as a barrier to participation in the program. Twenty shelters, or 14 percent of the total, reported that inadequate documentation resulted in denial of eligibility for homeless persons. Additionally, 25 percent of the shelters responding to this question (13 out of 53) stated that inadequate documentation caused lengthy delays in the food stamp application process.

Obtaining and safely maintaining the correct and numerous documentation papers required for the food stamp application process would be difficult for all persons. For the homeless it is particularly difficult because of their unstable living conditions. Examples of documents most often required for the food stamp application are proof of residence, proof of income, birth certificates, a social security card, and rent records. According to many of the shelter providers the homeless often do not have such basic documents as birth certificates and social security cards for themselves and/or family members. Lack of stable shelter, physical security and safety prohibits the homeless from carrying the necessary documentation.

The cost of acquiring lost documents is also prohibitive according to some shelter providers. One shelter provider explained that most of her shelter guests can not provide the money necessary to acquire the required documentation. For example, she explained, "most women have several children and each birth certificate costs $2."

Waiting time for verification materials such as birth certificates was also cited as a predominant reason for the lengthy delays experienced by the homeless when they apply for food stamps.

3. Program Information and Outreach

Twelve percent of shelter providers who cited specific barriers to participation (6 out of 50) noted lack of Food Stamp Program information and outreach as a barrier to the participation of eligible homeless persons. Several providers recommend increased dissemination of information about the availability of food stamps for the homeless.

4. Definition of Household

The current definition of a "household" for the purpose of food stamp eligibility determination was also cited as a major barrier to participation for the homeless who temporarily reside in the home of a related family. Five percent of the shelter providers reported that eligible homeless shelter guests had in the past been denied eligibility because they were forced to move in with another household whose income made them ineligible for food stamps.

Food stamp allotments are determined on the basis of "households," meaning an individual or group of individuals living together who customarily purchase food and prepare meals together for home consumption. A group of individuals living together will receive more food stamps if they are considered several individual households as opposed to one household. The food stamp statute

prevents groups of individuals from arbitrarily defining themselves as several households when in fact only one household exists. For example, 7 U.S.C. section 2012(i) provides "that parents and children, or siblings, who live together shall be treated as a group of individuals who customarily purchase and prepare meals together for home consumption even if they do not do so. There is no exception to this statute for family members, although the statute allows other unrelated groups to obtain separate household status while living together.

The statute requires that the income of all persons in the household be pooled when determining food stamp eligibility. This requirement assumes that all income is available to all related members of the household, even if individual family units continue to handle food and financial resources separately. Thus, the homeless may lose their food stamp eligibility solely because they are forced by circumstances to double or triple-up with relatives.

The above statute has prohibited otherwise eligible homeless from participating in the program. In a legal case in Florida, an adult couple and their young children had been receiving food stamps while renting a mobile home as their residence; when the home was condemned, they were forced to move into the wife's parents' house. Although the two families were not sharing food or cooking facilities, the young family lost its food stamps when the wife's stepfather refused to provide verification of his income to Florida food stamp administrators. (*Tripp* v. *Block,* No. 85-1203-Civ-T17 (Md. Fla. 1985))

In another case in Texas, a migrant farmworker family who had spent the summer of 1984 picking crops in Michigan lost access to food stamp benefits when they returned to their native area of Brownsville, TX. They were forced to take up residence with the mother's adult daughter because the trip back to Texas had used up whatever savings they had left. Although the two families comprised separate economic and living units, the migrant farmworker parents were denied the ability to receive food stamps as a separate household. The U.S. District Judge for the Southern District of Texas agreed with the plaintiffs in this case and prohibited U.S.D.A. from enforcing the statute against the plaintiffs (*Castillo* v. *Block,* No. B-81-260 (S.D.Tex. 1985)); however, the District Court's decision was overturned by the Supreme Court in 1986. (*Lyng* v. *Castillo,* 54 L.W. 4864 (U.S. Sup. Ct. June 27, 1986)).

5. Other

Complex program application forms, repeated visits required to the food stamp office and lack of funds for transportation to and from the office, high client caseloads per food stamp eligibility worker, the transient nature of the homeless person's lifestyle, and "bureaucracy and red tape" were also cited by the shelter providers as barriers to participation for the homeless.

Several shelter directors reported that families who were not eligible for food stamps while homeless because of meals available in the shelter, experienced lengthy delays in receiving benefits once they found a permanent residence. This creates a great strain on resources available to ease the transition from dependency in a shelter to independent living.

F. FEDERAL EFFORTS NOT EFFECTIVE IN IMPROVING ACCESSIBILITY

According to the General Accounting Office's *Overview and Perspectives on the Food Stamp Program:*

> Providing food stamps to the homeless is a complex problem involving major operating and administrative concerns. States may or may not have developed procedures and means for distributing food stamps to the homeless. Also, homeless people may not know that they are eligible for food stamps. Although the (Food and Nutrition) Service has sent letters telling States to eliminate barriers to the homeless population's participation, it has not developed a formal training package on this subject.

The survey data confirms the above remarks on the lack of uniform national procedures for facilitating the participation of eligible homeless in the Food Stamp Program. Program regulations are not being adhered to in some areas; and procedures, clearly cited in the Code of Federal Regulations, that could facilitate participation by the homeless are not being carried out. Specific methods which shelter providers report are not being utilized to ease food stamp participation of the homeless are discussed below.

Collateral Contacts Underutilized

If a homeless applicant cannot verify residency with documentation, the Federal regulations (7 CFR 273.2(f)(4)(ii)) instruct the food stamp office to use a "collateral contact." A collateral contact is defined as an oral confirmation of a household's circumstances by a person outside the household. If the homeless do not have any documentation attesting to their residency, they may be known to someone working at a shelter who could be used as a collateral contact. The rule requires the food stamp office to accept "any collateral contact which reasonably establishes the applicant's residency."

The expedited service regulations (7 CFR 273.2(i)(4)(i)) also require that State agencies make all reasonable efforts to verify the identity of applicants through a collateral contact to ensure that expedited services are available to those eligible.

While 77 percent of the shelter providers (105) state that there is "someone available at the shelter to assist in the food stamp application process," only 45 shelters state they have acted as a collateral contact.

Federal regulations state that if an applicant household fails to designate a collateral contact the State agency may select one, with the written or oral consent by the applying household. The large percentage of shelter providers in the committee survey who have not taken part in the application process as collateral contacts may reflect a lack of sufficient effort by the local and State agencies administering the Food Stamp Program to elicit or accept collateral contacts from homeless shelters.

Chapter VI: Improving Accessibility and Utility of Food Stamps for Eligible Homeless

A. ACCESSIBILITY

1. Recent Federal Effort Has Potential for Improving Accessibility

A recent revision to title 7 CFR, reflecting changes in statute in the Food Security Act of 1985, requires State agencies responsible for the issuance of food stamp benefits to provide a method to issue coupons to eligible homeless persons (e.g., arranging for direct delivery of coupons to them and assisting the households in finding collateral contacts) (7 CFR 274.1(a)). The implementation of this regulation has yet to be evaluated.

2. Case Studies of State and Local Efforts to Improve Accessibility

(a) Clarification of Eligibility of Homeless for Food Stamps:

1. The Commonwealth of Massachusetts, Executive Office of Human Services, Department of Public Welfare has issued two policy memoranda clarifying the eligibility of homeless individuals and families for the Food Stamp Program. The first memorandum, issued February 7, 1985, explains that a homeless individual or family's eligibility for food stamps cannot be denied solely because the household is homeless or lacks cooking facilities. It clarifies that there is no fixed or durational residency requirement in Federal regulations.

The second memorandum, issued April 15, 1986, addresses food stamp eligibility for homeless individuals residing in shelters providing meals. As a policy statement, it clarifies the regulations regarding the definition of an "institution" for homeless persons. It states that shelters serving individuals are not "institutions" because: (1) "individual shelters generally provide only one meal per day"; (2) "there is no reasonable certainty that a bed and a meal will be available to a particular homeless person from one day to the next;" and (3) "the food served in an individual shelter does not always qualify as a meal."

This memorandum also states that homeless families who are staying in family or mixed shelters may be eligible to receive food stamp benefits, if all other eligibility factors are met and the shelter provides its "residents" with less than 50 percent of three meals daily. Critical to their interpretation of "less than 50 percent of three meals daily" is the section specifying that "a doughnut and coffee do not qualify as a meal." (See Appendix E)

2. The Division of Family Services of the Missouri State Department of Social Services also revised its food stamp policy manual to assure the proper procedure for certifying homeless individuals. On August 6, 1984, the Department issued revisions addressing the fact that: (1) there is no durational residency requirement for food stamps; (2) residency need not be verified in some homeless situa-

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tions; (3) any collateral contact or documents which reasonably establishes the applicant's residency must be accepted; and, (4) mail delivery must be assured for the homeless at the county food stamp office. (See Appendix E)

The Missouri State office also clarified that a homeless client has no guarantee of being in a shelter night after night and therefore is not to be assumed a resident of an institution if they say they have slept in a shelter serving meals. This relevant change in the policy manual reads as follows:

> Provision of over 50 percent of three meals on one or more days during the issuance month will not cause a homeless person to be considered a resident of an institution unless that person is also living at the institution and the number of meals provided equal more than 50 percent throughout the issuance month.

(b) Improved Application Process at Public Assistance Offices:

1. In Allegheny County, PA, a survey provider reports there is a demonstration project under which the Department of Public Assistance and local homeless shelters are jointly assisting homeless individuals in completing public assistance forms. The county has designated a public assistance caseworker to assist homeless individuals with the application and certification process for all benefits for which they are eligible.

2. In 1984, the Baltimore City Department of Social Services established the Emergency Environmental Services Unit located in downtown Baltimore. The unit provides a "one-stop shopping" approach for the chronic and/or ill homeless seeking assistance. Homeless individuals come to the unit for day shelter, for placement in shelter for the evening, to apply for food stamps and other public assistance, for meal vouchers, or for referral to other services such as health care.

This unit has also facilitated communcation between the city and the privately funded agencies serving the homeless in Baltimore. Cooperation was accomplished by inviting private voluntary organizations to serve on the advisory council for the unit. In this way, they share program information and policy recommendations that improve the accessibility to food stamps and other services for the homeless.

(c) Improved Program Information

1. The Interagency Task Force on Food and Shelter based at the Department of Health and Human Services has reported that the homeless, particularly those who are mentally ill, need assistance in finding and qualifying for program benefits. One departmental effort to provide assistance to the homeless in applying for public assistance programs is ongoing in New York City. DHHS joined with New York City in November 1981, to conduct outreach efforts at shelters to identify homeless individuals who appear eligible for Social Security Disability Insurance (SSDI) or Supplemental Security Income (SSI) benefits.

Intake workers from New York City's Human Resources Administration screen incoming homeless families for Aid to Families with Dependent Children (AFDC) for food stamp eligibility at the city-funded shelters. They also assist the homeless in assembling the documentation required to support the case of those who appear to be eligible.

2. At this time, Washington, D.C. is launching an outreach program to inform the homeless who may be eligible for SSI benefits. As of this year, with the enactment of the Food Security Act of 1985, title XV, section 1507, SSI recipients are categorically eligible for food stamps. Hence, this outreach program for SSI can also function as a food stamp outreach program.

3. Project Bread, Hunger Hotline in Boston, MA, an information, referral and advocacy center on food and hunger issues working with over 300 emergency food providers in eastern Massachusetts, in cooperation with the Massachusetts Department of Public Welfare has printed food stamp information sheets for distribution to the homeless and advocates for the homeless. (See Apppendix F)

B. UTILITY

At the Select Committee hearing, Veronica Maz, president of Martha's Table, a privately funded organization running a soup kitchen for poor children and a food delivery van for the homeless, told the Committee ". . . food stamps as they can presently be used, are of limited utility to the homeless," because they generally lack facilities to cook and store food.

Ms. Maz proposed amending the Food Stamp Act to allow the homeless to use their food stamps to purchase low cost hot meals prepared by nonprofit organizations. This proposal was also made by the director of the Star of Hope Mission, a homeless shelter in Houston, TX visited during a Select Committee field hearing in June 1986. At a conference conducted by the National Institute for Neighborhood Self-Help, representatives from 17 States expressed an interest in this proposal, indicating widespread support for legislative activity in this area.

Based on recommendations from Committee hearings, from the private sector, and the preliminary data from this survey, the Committee has worked with the House Agricultural Committee on the crafting of legislation to improve the utility of the Food Stamp Program for homeless persons who can not prepare and store their own food. This legislation enacted on October 27, 1986, as an amendment to the Omnibus Drug Enforcement, Education and Control Act (Public Law 99-570), amends the Food Stamp Act to allow the homeless to utilize food stamps for hot meals. Under past law, the homeless certified for food stamps could only use the coupons to purchase staple foods for preparation and consumption. They could not use their stamps to purchase prepared, hot meals.

Specifically the new legislation permits nonprofit homeless shelters and feeding establishments (authorized by the appropriate State and local agency) to accept food stamps from homeless persons for low-cost prepared meals, on a voluntary basis. Food stamps can only be redeemed by the program operator for food products through food wholesalers or supermarkets. No cash transactions can be made. All costs of preparation, program administration and other services will have to be absorbed by the nonprofit contractor through contributions and volunteer assistance.

The Committee's survey collected quantitative and qualitative information from shelter providers on their endorsement of the use

of food stamps by the homeless for prepared meals at soup kitchens and/or shelters.

1. Opinion of Shelter Providers on Use of Food Stamps by Homeless for Meals at Shelters and/or Soup Kitchens

There was overwhelming support expressed by the shelter providers for the use of food stamps by the homeless for prepared meals at shelters and soup kitchens. Nearly two-thirds (90 out of 138 responding) said they would like to see the use of food stamps for prepared meals at nonprofit shelters and/or soup kitchens, only 26 percent (25) expressed definite opposition, and 9 percent (13) did not state a definite opinion. Providers who currently serve no meals were those most likely to support this proposal, with four out of five (20 out of 25) of this group endorsing.

This use of food stamps was strongly endorsed by both shelters whose primary funding is public and those who depend primarily on private voluntary contributions. Since the former group is more familiar with procedures for obtaining moneys from government programs they were also more likely to endorse the use of food stamps for meals than the shelters who do not depend on public funding.

One shelter provider reported the homeless themselves endorse the use of food stamps for prepared meals. Surveying the homeless in his shelter who would be potential beneficiaries of this change in food stamp legislation, he noted that they "seem to think it is a very good idea."

2. Comments on the Option of Using Food Stamps for Prepared Meals

(a) Allowing homeless to use food stamps at certified homeless shelters and/or soup kitchens would enable nonparticipating eligible homeless individuals an opportunity to participate in the Food Stamp Program.

The participation rate of eligible homeless was significantly lower (16 percent) in those shelters endorsing the proposal compared to the participation rate in those shelters not endorsing. This indicates that while the proposal to allow the use of food stamps for meals would have the direct effect of increasing the utility of food stamps for the homeless, shelter providers perceive it to have the additional indirect benefit of improving the participation rate of eligible homeless.

(b) Option would enable nonprofit organizations to provide a more nutritious diet and to serve more homeless persons.

Of the shelter providers currently serving meals, many stated they have difficulty obtaining sufficient food and funding on a routine basis to adequately feed their homeless clientele. The primary reason cited by shelter providers for their endorsement of the use of food stamps by the homeless for prepared meals is its potential for improving the quality and quantity of food available to the homeless from shelters and soup kitchens. Several providers stated that the option of redeeming food stamps for the purchase of meals would also permit them to serve more of those in need.

The remarks of one shelter provider illustrate the general intent of these comments:

Proper nutrition is a basic right and necessity of life; yet homeless people cannot afford to eat properly and many shelters operating on shoe string budgets cannot provide nutritious meals. If food stamps were readily available to these individuals and nonprofit organizations many of the hunger and health problems among the homeless could be solved.

The improved meals could be provided because the nonprofit organizations would be able to purchase more nutritious foods, such as meat, milk, and fresh vegetables, in bulk and therefore at lower cost. One provider explains how food stamps would assure his being able to provide an adequate diet for 680 homeless men, women, and children:

We know that food stamps would not be a substitute but an augment to the food that we provide them * * *. We can stretch the $79 (maximum food stamp benefit) through the purchase of wholesale food as well as the purchase of damaged packaged food that can not be sold to the general public; we can purchase these foods through various food sources at extremely low-cost prices which would then make the food stamps go a lot farther than if the food was purchased at he local grocery store (by the homeless).

(c) Option would improve self-worth of homeless.

Another frequent positive response on the merits of the proposal was its potential to encourage residents to feel they are contributing to the shelter and thus help maintain their sense of independence and self-worth.

(d) Option could prevent illegal sale of food stamps by homeless.

A few shelter providers point out that this proposal could prevent the illegal sale of food stamps by some homeless for cash worth less than the coupons.

(e) Reasons cited for nonsupport.

The reasons cited for nonsupport of the proposal by 26 percent of the shelter providers are diverse and reveal no single cause for opposition. Reasons frequently cited are: (1) burdensome paperwork associated with government programs; (2) insufficient staff and budget at the shelter to serve meals; and (3) a fear of creating a two-tiered feeding program for those homeless with and without food stamps.

3. Proposal Design

The providers were asked to state what the best method for the redemption of food stamps for meals would be. Choices included: (1) authorizing the homeless to use food stamps for individual meals at nonprofit shelters or soup kitchens; (2) authorizing the homeless to turn some or all of their food stamps over to the shelter in exchange for meals; or, (3) both options. Note that the legislation recently enacted permits just the first option to be implemented.

Of those 73 shelters selecting an option, 11 responded that both options should be available to the homeless, 31 chose the "individual meals" option and 31 chose the "turn over some or all of food stamps to shelters" option. The majority of those choosing the latter option stated that a large portion or all food stamps should be turned over to the shelter.

Respondents pointed out that permitting the homeless to turn over food stamps to shelters would encourage more churches to begin feeding programs, assure more nutritious meals and the purchase of particular foods for those requiring special diets as a

result of chronic diseases. Further, several shelter providers feel this option would lower the cost of food services by allowing for meal planning and bulk prepurchasing.

The need to permit both options was cited by several survey respondents who pointed out many homeless are not assured shelter from night to night. They recommended only those shelters assuring beds on a monthly basis be permitted to ask shelter guests to turn over their monthly food stamp allotment. For the homeless at other shelters it was recommended they be permitted to use food stamps for individual meals. Further, it was noted that both options are essential to the homeless seeking meals because circumstances for homeless people change rapidly and some shelters would not have the capacity to provide on-site dining for all three meals.

In addition to the above options, several shelter directors recommended the proposal be expanded to include for-profit restaurants, such as the 352 currently certified to redeem food stamps from the elderly in 14 States (see discussion below on legal precedents for this proposal). Such certifications would, of course, have to be carefully audited to prevent fraud and assure program accountability.

4. Legislative Precedents

(a) Many organizations serving individuals who have difficulty preparing their own food are currently authorized to accept food stamps for meals.

The Food Stamp Act explicitly defines purchaseable food as "any food or food product for home consumption except alcoholic beverages, tobacco, and hot food products ready for immediate consumption." (7 U.S.C. sec. 3012(g) (supp. 1986). There are, however, six exceptions to this definition:

1. Persons 60 years or older who receive Supplemental Security Income benefits, and their spouses, may use their food stamps to purchase meals prepared by and served in senior citizens' centers of public or private nonprofit establishments that contract with the State to offer meals for such persons at concessional prices. (7 U.S.C. sec. 2012(g)(3))

2. Persons who are 60 years or older and persons who are physically or mentally handicapped or otherwise so disabled that they are unable to prepare all of their meals, may use their food stamps to purchase meals prepared for and delivered to them at their home by a public or private nonprofit organization or by a private establishment that contracts with the State to perform such services at concessional prices. (7 U.S.C. sec. 2012(g)(5))

3. Narcotic addicts or alcoholics served by drug or alcoholic rehabilitation programs may use their food stamps to purchase meals prepared and served under such programs. (7 U.S.C. sec. 2012(g)(5))

4. Persons who are disabled and living in a public or private group living arrangement of less than 16 persons certified by the State may use food stamps to purchase meals in these living arrangements. (7 U.S.C. sec. 2012(g)(7))

5. Women and children temporarily residing in public or private nonprofit shelters for battered women and children may

use food stamps to purchase meals prepared and served in such living arrangements. (7 U.S.C. sec. 2012(g)(8))

During fiscal year 1985, the following number of organizations were authorized to accept food stamps for meals:

Communal Dining	1,694
Meals-on-Wheels	1,190
Alcoholic/drug treatment centers	615
Private restaurants	352
Battered Women's Shelters	20
Total	3,871

Since 1970, exceptions to the definition of "food" in sec. 2012(g) have been added to the act as Congress has increasingly recognized the need for additional assistance for groups who, although eligible for food stamps, were effectively prohibited from participating in the program because of particular barriers they encountered.

In the 1970 amendments to the Food Stamp Act, the first exceptions to the requirement that food stamps be redeemed only in "retail stores," and that the purchased food not be "hot food products ready for immediate consumption," were established. The intent of the amendment was clear:

> By authorizing persons 60 years of age or older, who are participating in the program, to use stamps to purchase meals prepared by and delivered to them by either a political subdivision or nonprofit organization the program seeks to reach the ill and incapacitated * * * (H. Rept. No. 91-1402)

In the 1973 amendments, food stamps were permitted to be redeemed by the elderly in communal nonprofit dining facilities such as senior citizen centers. Thus, for the first time, eligible food stamp recipients were permitted to use food stamps to purchase meals outside of the home. In a later congressional report discussing this amendment, the intended effect of increasing the accessibility of food stamps for this vulnerable population was explained:

> Many elderly persons have difficulty in getting around, shopping, and cooking their own meals, especially if they live alone. In addition, some elderly persons live in rooms with no cooking facilities. Often there are no title VII (currently under title III of the Older Americans Act) elderly nutrition programs in their area, but there may be a restaurant offering meals to the elderly at reduced prices. The elderly should be able to use food stamps to pay for these meals; otherwise they will effectively be kept out of the Food Stamp Program. (H. Rept. No. 95-464)

Additionally, in 1973 an amendment to the Food Stamp Act enabled members of eligible households who were participating in a drug addiction or alcoholic treatment and rehabilitation program to use coupons to purchase meals prepared for and served to them by such nonprofit organizations or institutions. (Public Law 93-86, 87 Stat. 221 (1973)) Drug and alcohol abusers participating in treatment programs were therefore another group of individuals for which the food stamp statute needed to be tailored to assure their effective participation.

The 1977 amendments to the Food Stamp Act expanded the exceptions to permit food stamp use for the purchase of home delivered meals by the physically or mentally handicapped. Hence, the purchase of prepared meals with food stamps was allowed for another group of low-income individuals who cannot effectively prepare nutritious meals on their own.

The 1979 amendments authorized the use of food stamps for meals in group living facilities certified under SSI rules. This was precipitated by other changes in food stamp eligibility and benefit rules legislated in 1977 which were "causing severe hardship among elderly and disabled recipients with high medical and shelter expenses." (S. Rept. 96-236, 1st Sess.)

Amendments in 1980 expanded the exceptions to enable battered women and their children in shelters to purchase meals. "Permitting such shelters to receive food stamps if the women and their children who stayed in the shelters were food stamp recipients would assure nutritious meals for the women as well as reduce operating costs for the shelters." (H. Rept. 96-788, 2nd Sess.)

(b) The Committee's investigations indicate the homeless are like the other groups that have been recognized as needing special assistance in order to effectively participate in the Food Stamp Program.

The homeless, like the elderly, the disabled, the mentally ill, and battered women and children are another group of people for whom food stamps are ineffective without special provisions. Since the homeless generally do not have cooking facilities or refrigeration, it is often fruitless to use food stamps to purchase food for home consumption. Yet, without the assistance of food stamps, eligible low-income individuals and families who do not even have a home are less likely to obtain a nutritious diet.

(c) Means can be developed to achieve accountable issuance, use and redemption of food stamp coupons under such a proposal.

Testimony before the Committee described several procedures which might assure accountability in the use of food stamps for hot meals and in the redemption of food stamps by nonprofit organizations. The residents of shelters receiving food stamps would surely be eligible and homeless participants at soup kitchens could be identified by nonprofits as homeless. To ensure the accountability of nonprofit organizations in their redemption of food stamps received from the homeless, the same procedures could be used as those for organizations contracting with state agencies to provide meals to the elderly.

RECOMMENDATIONS

A. FEDERAL FOOD AND HEALTH ASSISTANCE

The following recommendations are based on findings and recommendations made by numerous national, State and local organizations working for the homeless. Most of the following proposals were also suggested by shelter providers responding to the Committee's survey.

1. Increase Access to Food Stamps for Homeless Individuals and Chronically Mentally Ill Persons At-Risk of Homelessness

Legislation:

(a) Fund State efforts to provide Food Stamp Program information to the homeless.—Using existing programs (e.g., Massachusetts) as models, the Food Stamp Act should be amended to reimburse States for activities and materials that provide information about Food Stamp Program eligibility to the homeless.

(b) Modify definition of "household" for food stamp eligibility.—To sustain family support systems and improve food assistance to the "hidden homeless," those who are forced to double up in the homes of relatives, the Food Stamp Act should be amended to remove the relationship rule prohibiting parents and children, or siblings who live together from being considered as separate households. This would result in the determination of separate households only when household members do not customarily purchase food and prepare meals together for home consumption.

Oversight:

(a) Encourage prescreening for public assistance and food stamps at local shelters.—USDA and DHHS should be required to work with States toward the development of public/private cooperative efforts to provide program application assistance for food stamps and other programs, including SSI, AFDC, Social Security Disability Insurance, General Relief, Veterans and Medicaid benefits. Such application assistance should also be targeted to the homeless who are preparing to leave shelters and move to a permanent residence.

(b) Monitor State implementation of legislation requiring food stamp issuance to the eligible homeless.—The mandate of the Food Security Act of 1985 that State agencies provide a method of coupon issuance to eligible homeless persons should be monitored by USDA to ensure its rapid and effective implementation.

(c) Assure Provision of technical assistance to States to clarify eligibility of homeless for food stamps.—USDA should be required to disseminate examples of State and local policy memoranda which clarify the eligibility of the homeless (including the Missouri and

Massachusetts memoranda) to all State agencies administering the Food Stamp Program and work with State and local agencies to incorporate similar provisions into their program manuals.

(d) Monitor implementation of new legislation requiring pre-release certification of mentally ill for food stamps and Supplemental Security Income benefits.—P.L. 99-570 includes a provision which orders the Secretary of HHS and the Secretary of USDA to jointly develop a system allowing individuals to apply for Supplemental Security Income (SSI) and food stamp benefits in a combined application prior to discharge or release from a public institution (such as a mental hospital or prison). This legislation intends to ease the transition to the community and to prevent homelessness for the mentally ill and incarcerated. The implementation of this new system should be monitored to determine its effectiveness in improving food stamp and SSI participation by eligible residents of institutions.

2. Increase Utility of Food Stamps for the Homeless

Oversight:

With the enactment of P.L. 99-570, the Omnibus Drug Enforcement, Education and Control Act, homeless individuals who qualify for food stamps are authorized to use them to purchase prepared meals at certified nonprofit soup kitchens or homeless shelters, on a voluntary basis. This new option should be carefully monitored and evaluated to determine its effectiveness in increasing the utility of food stamps for the homeless, as well as in improving the number and quality of meals available to them from the nonprofit sector.

3. Require USDA to Increase Surplus Commodity Donations to Charitable Organizations Feeding the Homeless

Legislation:

USDA should be encouraged to donate more surplus commodities (section 32 and 416 bonus) to soup kitchens and shelters for use in meal preparation. Innovative use of section 32 (surplus dairy products), such as the processing of nonfat dry milk into instant breakfasts for distribution to the homeless, should also be encouraged.

4. Provide Grants for Physical and Mental Health Services Targeted to the Homeless

Legislation:

A program should be funded for a minimum of 3 years, to be administered by DHHS, providing grants to local nonprofit health care organizations for the establishment of physical and mental health care services targeted to the homeless.

B. EMERGENCY AND LONG-TERM ACTIONS BEYOND FOOD ASSISTANCE

In addition to the recommendations outlined in the section above, the homeless need more emergency services—including beds, food, warm clothing, and health care. Once people have these basic necessities, transitional services such as those listed below are required to assist the homeless in becoming self-sufficient: pro-

grams to encourage homeless children and teenagers to complete their education; job training and placement programs associated with shelters and day centers for the homeless; supportive services such as family counseling and day care for young children; and, expanded community mental health facilities.

Further, to prevent homelessness, increased public and private efforts toward long-term solutions must be initiated, including: curtailment of the decline in affordable housing stock for the poor; construction and rehabilitation of low-cost housing; establishment of more group residences for the mentally ill; and, provision of technical and financial assistance to those low-income renters or homeowners threatened with evictions or mortgage foreclosures.

Through block grant programs, the Federal Government has been a source of funds in some States for activities such as those recommended above. Services provided by the private sector to homeless persons have also increased significantly over the last few years. However, the growth in the numbers of homeless and the evidence of hunger and serious physical and mental health problems, particularly among homeless families with children, clearly demonstrates these efforts are not sufficient.

Government at the Federal, State, and local levels (the Federal Government through the Emergency Assistance Program in many States), are paying exorbitant costs for short-term emergency remedies. Federal programs and funds can be used more effectively. In cooperation with State and local governments and the private sector, we must take on the moral and fiscal imperative to eliminate homelessness and hunger. Toward this end, the committee strongly endorses the enactment of a strong Federal policy including the implementation of the policies and programs recommended above.

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21. Housing and Community Development Subcommittee of the Committee on Banking, Finance and Urban Affairs, U.S. House of Representatives, (December 15, 1982), *Homelessness in America;* Subcommittee on Intergovernmental Relations and Human Resources of the Committee on Government Operations, U.S. House of Representatives (October 3, November 20, and December 18, 1984) *Hearings: The Federal Response to the Homeless Crisis;* and Select Committee on Hunger, op cit.

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APPENDIX A

NINETY-NINTH CONGRESS
MICKEY LELAND, TEXAS
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U.S. House of Representatives
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ROOM H2-807, HOUSE OFFICE BUILDING, ANNEX NO. 2
WASHINGTON, DC 20515

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MINORITY STAFF DIRECTOR
TELEPHONE (202) 226-5480

March 20, 1986

Dear shelter provider:

We are writing to request your cooperation and assistance in completing the enclosed survey. We believe this information will be very useful to Members of the Select Committee on Hunger as we continue to address the serious problems associated with hunger among the homeless. We hope to obtain the best available information from shelter providers across the nation with regard to sources of food for your shelter residents, the accessibility of the Food Stamp Program for eligible homeless persons, current methods utilized in your locality for certifying homeless persons for food stamps, the funding for your services, and recommendations for improved food assistance to the homeless.

On March 6, 1986 the Select Committee held a hearing to address the problem of hunger among the homeless. Since that time we have been working with the U.S. Department of Agriculture to establish a pilot project for the use of Food Stamps in a communal, non-profit dining facility. We are undertaking these initiatives because the homeless are one of the most vulnerable groups affected by hunger and poverty in this nation. Assuring adequate food assistance for the homeless is a critical and growing problem facing shelter providers and public officials in every city and locality across the nation, yet information upon which to make wise policy decisions is not complete.

We recognize that you might not have the information to provide a complete response to every question. We would like actual figures on the number of your homeless clients who are eligible for food stamps and of those eligible the number who are receiving food stamp benefits. Where the requested information is incomplete or unavailable, please indicate. If you have additional information that is pertinent to the question, please include it, even if it is not in the form outlined. Feel free to use additional paper for detailed answers.

If you or your staff have any questions or need for clarification, please contact Vivian Gabor on the Select Committee staff at (202) 226-5470. Committee staff will be available to assist in completing the survey.

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So that the information can be summarized and disseminated as soon as possible, the Committee would very much appreciate receiving your completed survey by April 25, 1986.

Thank you for your assistance.

Sincerely,

MICKEY LELAND
Chairman

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QUESTIONNAIRE TO HOMELESS SHELTER PROVIDERS FROM CONGRESSMAN MICKEY LELAND, CHAIRMAN HOUSE SELECT COMMITTEE ON HUNGER

"ACCESSIBILITY OF FOOD STAMPS FOR HOMELESS PERSONS"

A. BACKGROUND QUESTIONS

1. Name of Organization_____ Date_____

   Contact Person_____

   Address_____ Phone ( )_____

2. Number of Homeless Persons in Shelter (today/at full capacity):

   Total____/____ Men____/____ Women____/____
   Families____/____ Children____/____

3. During which part of the year are your services most used?

4. How long has your shelter been operating?_____

5. Which, if any, meals are served daily at your shelter?_____

6. Are residents able to prepare food at the shelter?_____

7. Are residents permitted to bring prepared food into the shelter?_____

8. Primary sources of food for your homeless residents:

   _____Soup Kitchens _____Begging _____Shelter Meals
   _____Restaurants _____Dumpsters _____Food Stamps
   _____Other (please specify)

9. Is there someone available at the shelter to assist in the Food Stamp application process?_____

B. ELIGIBLE HOMELESS PERSONS RECEIVING FOOD STAMPS (Please provide specific figures based on the residents currently at your shelter)

1. Number and percentage of current shelter residents you think are eligible for food stamps _____
   For those who are not eligible, why do you believe they are not?_____
   _____
   _____

2. Number and percentage of those you think are eligible that are receiving Food Stamps_____

C. FOOD STAMP CERTIFICATION AND RECEIPT OF BENEFITS FOR HOMELESS PERSONS

1. For those people who do get Food Stamps:

   What is the documentation required?_____

   How are they delivered to the homeless person?_____

   How are documentation problems handled, such as documentation of residence, mailing address, and income?_____

   What kind of documentation have you been asked to provide for your shelter residents?_____

   Have you participated in the application process as a collateral contact?_____

   Are there any specific procedures in your locality for certifying homeless persons for food stamps?_____

D. REASONS PERSONS ELIGIBLE FOR FOOD STAMPS ARE NOT RECEIVING FOOD STAMPS
(Please respond to these questions using information from 1986.)

1. Number and percentage of residents who have attempted to get food stamps and have been determined ineligible for reasons other than income._____
   Please cite examples of the most predominant reasons persons are denied eligibility._____

2. Number and percentage of residents who are trying to get food stamps, but experiencing lengthy delay.
   If delays exist please cite examples of the most predominant reasons.

3. Please cite examples of barriers to participation in the Food Stamp Program for your homeless residents that are not cited above._____

Select Committee on Hunger Questionnaire
Page Three

E. USE OF FOOD STAMPS FOR HOT MEALS

1. Would you endorse the use of Food Stamps for meals served to the homeless at non-profit shelters and soup kitchens?_____
   Please explain your response._____
   _____
   _____

2. If your response to the above question is yes, would it be preferable for the homeless to be able to redeem food stamps for individual low-cost hot meals or to turn over a large portion of their total food stamps to shelters to receive three meals daily? Please explain your response._____
   _____
   _____

F. RECOMMENDATIONS TO ASSURE THE HOMELESS ARE ABLE TO EAT THREE NUTRITIOUS MEALS DAILY _____
_____
_____
_____

G. HEALTH PROBLEMS ASSOCIATED WITH HUNGER FOR THE HOMELESS

Can you comment on health problems associated with hunger and/or special nutritional needs among your homeless residents (such as the extent of anemia, low birthweight, infant mortality, infections and chronic diseases requiring special diets)?_____
_____
_____
_____

G. FUNDING FOR YOUR SERVICES

1. Primary source of your cash and in-kind resources:_____
   What percentage of your resources are public funds (please specify specific program sources)? Federal_____
   State_____ Local_____

2. If the demand on your services is increasing do you expect that private donations will be sufficient to allow you to meet this increased demand (please explain)?_____
   _____

H. ANY OTHER COMMENTS

APPENDIX B

List of Shelters Responding to Survey

Brother Bryan Mission, Sarah McMichael, P.O. Box 11160, Birmingham, AL 35203, 205-595-5430.

Cooperative Downtown Ministers, Mary Martin, P.O. Box 11722, Birmingham, AL 35202, 205-592-4150.

First Presbyterian Women's Shelter, Lucile White, 2761 Sawyer Circle, Birmingham, AL 35216, 205-979-5563.

Greater Birmingham Ministeries, Elise Penfield, 607 21st Street, North, Birmingham, AL 35203, 205-324-2935.

The Salvation Army Lodge, Major David Jones, 2130 11th Ave., North, Birmingham, AL 35234, 205-328-5656.

Hannah Home, Merrel Stringer or Denise Davidson, P.O. Box 501, Pell City, AL 35125, 205-338-9471.

Advocates for Battered Women, Linda Butler, P.O. Box 1954, Little Rock, AR 72203, 501-376-3219.

Salvation Army, Major Lester Anderson, 1111 Markham, Little Rock, AR 72203, 501-374-9296.

Central Arizona Shelter Services, Mary Orton, 1209 W. Madison, Phoenix, AZ 85004, 620-256-6945.

Berkley Support Services, Robert Barrer, 2100 Martin Luther King Jr. Way, Berkeley, CA 94701, 415-848-3378.

Youth Services Gay & Lesbian Center, Joel Schwartz, 1213 N. Highland, Hollyood, CA 90038, 213-464-7400 ext. 434.

Living Water Mission, Gayla Donaldson, P.O. Box 148, Lancaster, CA 93534, 805-945-1441.

Valley Oasis Shelter, Jan Rochelle, P.O. Box 4226, Lancaster, CA 93539, 805-945-6736.

Family Crisis Center, Aida Kuendig, 823 Ruicon Ave., Livermore, CA, 415-449-1664.

Shepherd's Gate, Alice Ann Cantelow, 1639 Portola Ave., Livermore, CA 94550, 415-449-0163.

Tri-Valley Haven for Women, Helen Meier, P.O. Box 2190, Livermore, CA 94550, 415-449-5846.

Family Shelter for the Homeless, Sally Ann Chupool, 1401 Chestnut Street, Long Beach, CA 90813, 213-599-7661.

American Philanthropy Assoc., Toney Chisum, Jr., 101 Santa Barbara Plaza, Los Angeles, CA 90008, 213-295-3707.

Center for Pacific Asian Family, Nilda Rinsonte, 543 N. Fairfax, Room 108, Los Angeles, CA 90036, 213-653-4042.

Good Shepherd Center, Sister Julia Mary, 267 N. Belmont Avenue, Los Angeles, CA 90026, 213-250-5241.

Homing Inc., Ruth Edwards, 2627 Van Burren Place, Los Angeles, CA 90007, 213-735-3225.

Los Angeles Mission, Rev. Mark Holsinger, 443 S. Los Angeles Street, Los Angeles, CA 90013, 213-629-1227.

New Jerusalem Reaching Out, David Valdez, 4408 E. Dozier Street, Los Angeles, CA 90022, 213-260-4880 or 721-1337.

Sunshine Mission, Patty Andress, 2600 S. Hoover, Los Angeles, CA 90007, 213-747-7419.

Upper Central Friendship House, Rev. Jini M. Moore, 911 E. 25th Street, Los Angeles, CA 90011, 213-747-6472.

Hestia House Shelter, Margaret Potvin, 78 N. Marengo Ave., Pasadena, CA 91101, 818-793-5171.

Union Station, The Depot, Cindy Abbott, 132 N. Euclid, Pasadena, CA 91101, 818-792-6564.

Pomona Valley Council of Churches, Lucky Phelps, 1753 N. Park, Pomona, CA 91768, 714-629-3743.

Harbor Interfaith Shelter, David Christiansen, 466 W. 21st Street, San Pedro, CA 90731, 213-831-0589.

Turning Point Homeless Shelter, Judy Shorrock, 245 Hill Street, Santa Monica, CA 90405, 213-394-8299.

YWCA-Wings Shelter, Yvonne Schmugler, P.O. Box 1464, West Covina, CA 91793, 818-331-0814.

Catholic Rainbow Outreach, Ben Read, 11419 Carmenita, Whittier, CA 90605, 213-944-2283.

Salvation Army, Lt. Arnold Hassler, P.O. Box 954, Whittier, CA 90608, 213-698-8348.

Children's Bureau, Mary Downes, 6851 Lennox, Van Nays, CA 91405, 818-908-5060.

L.I.E.U. Cap Shelter, Jeanne Venier, 641 Westminster Ave., Venice, CA 90291, 213-392-8523.

YWCA of Great Bridgeport, Alison C. Mitchell, 758 Fairfield Ave., Bridgeport, CT 06604, 203-334-6154.

Salvation Army Emergency Shelter, Sandy Barry, P.O Box 628, Hartford, CT 06142, 203-525-1898.

Salvation Army, Captain Willard Tate, P.O. Box 707, Norwich, CT 06360, 203-889-2329.

Norwalk Kiwanis Emergency Shelter, Evelyn Avoglia, P.O. Box 496, S. Norwalk, CT 06856, 203-866-1057.

Comitis Crisis Center, Anne Ayers, P.O. Box 913, Aurora, CO 80040, 303-341-9160.

The House of Neighborly Service, Toni Sandoval, P.O. Box 627, Brighton, CO 80601, 303-659-2316.

A.C.C.E.S.S. Housing, Mary Cosgrove, 7190 Colorado Blvd., Commerce City, CO 80022, 303-289-6569.

Denver Indian Health Board, Vera Mitchell, 1739 Vine Street, Denver, CO 80206, 303-320-3974.

Sacred Heart House, Marylou Morgan, 2844 Lawrence Street, Denver, CO 80705, 303-296-6686.

Samaritan Shelter, Father William Kraus, 1836 Logan Street, Denver, CO 80203, 313-861-8060.

Volunteers of America, Sue Russell, 1555 Xavier Street, Denver, CO 80204, 303-620-9190.

The Jeffco Action Center, Inc., Rena Mackrell, P.O. Box 5609, Lakewood, CO 80215, 303-237-7704.

Orlando Union Rescue Mission, Don Moody, P.O. Box 2614, Orlando, FL 32802, 305-422-4855.

Spouse Abuse Inc., Margaret Anglin, P.O. Box 6276, Orlando, FL 32853, 305-886-2856.

Anthony House, Reverend John Regan, P.O. Box 880, Zellwood, FL 32798, 904-383-5577.

Booth House Shelter, Linda Heigert, 114 E. 5th Street, Alton, IL 62002, 618-455-7764.

CEDA, Desiree Wilson, 624 S. Michigan Avenue, Chicago, IL 60605, 312-435-6808.

Chicago Abused Women, P.O. Box 476608, Chicago, IL 60647-6608, 312-935-2444.

Rainbow House, Margaret Ann Jozsa, P.O. Box 29019, Chicago, IL 60629-0019, 312-521-4865.

Salvation Army, Captain Michael Fletcher, 800 West Lawrence, Chicago, IL 60640, 312-275-9383.

The Ark Shelter, Laura Katz, I.S. Franklin Street #609, Chicago, IL 60606, 312-346-6700.

Crisis Center for South Suburia, Christine Call Mendoza, P.O. Box 304, Worth, IL 60482, 312-974-1091.

The Salvation Army, Jody Borders, 736 W. Main Street, Lexington, KY 40508, 606-252-7706.

Mission House, Inc., Father John H. Morgan, 824 South First Street, Louisville, KY 40203, 502-589-5028.

St. Vincent de Paul Center, Jim Grote, 1034 South Jackson Street, Louisville, KY 40203, 502-584-2480.

The Salvation Army, Ina A. Snook, 823 South Brook Street, Louisville, KY 40203, 502-587-8464.

Pine Street Inn, Lyndia Downie, 444 Harrison Avenue, Boston, MA 02118, 617-482-4944.

Shelter, Inc., Ellen Spiegel, P.O. Box 516, Cambridge, MA 02139, 617-547-3448.

Little Sisters of Assumption, Sue Beaton, 45 Magnolia Street, Dorchester, MA 02125, 617-442-1880.

The Salvation Army, Captain Leo M. Lloyd, 72 Chapman Street, Greenfield, MA 01301, 413-773-3154.

Shattuck Shelter, Bob McDonnell, 170 Martan Street, Jamaica Plains, MA 02130, 617-522-8110 ext. 229.

Jessie's House, Catherine Bennett, 82 Bridge Street, Northampton, MA 01060, 413-586-8212.

Sojourner House, Annie Goffigan, 85 Regent Street, Roxbury, MA 02119, 617-427-0622.

Youville House, Barbara Garneau, 133 Granite St., Worcester, MA 01604, 617-753-3084.

Ozanam House, Heather McDonald, 36 King Street, Worcester, MA 01610, 617-755-5349.

Catholic Human Development Office, Dennis Sturtevant, 117 Maple SE, Grand Rapids, MI 49503, 616-459-8223.

Dwelling Place Inn, LaMart Hightower, 44½ S. Davison, Grand Rapids, MI 49503, 616-459-5076.

Mel Trotter Ministries, Tom Pearce, 225 Commerce, Grand Rapids, MI 49503, 616-454-8249.

The Salvation Army Family Services, Joanne Woods, 67 Barclay NE, Grand Rapids, MI 49503, 616-776-0911.

The Salvation Army Men's Community Shelter, Major Ralph Metz, 1491 S. Division, Grand Rapids, MI 49503, 616-452-3133.

Y.M.C.A. Domestic Crisis Center, Carolina Bunkhorn, 25 Sheldon, Southeast, Grand Rapids, MI 49503, 616-451-2744.

Housing Resource Program, Mary J. Jackson, 2315 Chicago Avenue South, Minneapolis, MN 55404, 612-870-0810.

Simpson Transitional Housing, Susan M. Wilhem, 2740 1st Avenue South, Minneapolis, MN 55408, 612-874-8683.

Kansas City Rescue Mission, Joe Colaizzi, 523 Walnut Street, Kansas City, MO 64106, 816-421-7643.

The Salvation Army, Billie C. Miller, P.O. Box 412577, Kansas City, MO 64141, 816-756-1455.

Hillcrest Ministries, Elaine Fahrmeier, P.O. Box 17, Liberty, MO 64068, 816-781-8988.

The Salvation Army, Captain Rock Weindorf, 24 Faye Avenue, St. Charles, MO, 314-946-7966.

Cass Catholic Worker, Sister Carol Donohue, 1849 Cass Avenue, St. Louis, MO 63106.

Our Lady's Inn, Beth O'Brien, 1050 Julia Avenue, St. Louis, MO 63104, 314-241-6050.

St. Martha' Hall, Michelle Schiller-Ramirez, P.O. Box 4950, St Louis, MO 63108, 314-371-4357.

The Salvation Army Emergency Lodge, Captain Mary Boyert, 3744 Lindell Blvd., St. Louis, MO 63108, 314-534-1250.

The Salvation Army Harbor House, Captain Jack Bennett, 3010 Washington, St. Louis, MO 63103, 314-652-3310.

The Salvation Army, Major Maud Sullivan, 200 W. Bonanza, Las Vagas, NV, 702-870-4430.

The Salvation Army, Norman McCauley, 58 Clinton Street, Concord, NH 03301, 602-224-5586.

The Salvation Army, Captain Lionel Chapman, 22 S. Texas Avenue, Atlantic City, NJ 08401, 609-344-0660.

The Salvation Army Emergency Shelter, Juliet Grant, 1018 East Grand Street, Elizabeth, NJ 07201, 201-352-7057.

The Salvation Army, Cathy Deats, 13 Trinity Place, Montclair, NJ 07042, 201-744-3312.

The Salvation Army, Tonie S. Cameron, 95 Spring Street, Morristown, NJ 07960, 201-538-0997.

The Salvation Army, Lt. Anthony Marciano, 550 Main Avenue, Passaic, NJ 07055, 201-779-1155.

County Shelter, Judith Blustein, 389 Grand Street, Paterson, NJ 07505, 201-532-6220.

Eva's Shelter, Judith Blustein, 389 Grand Street, Paterson, NJ 07505, 201-532-6220.

Paterson Family Shelter, Judith Blustein, 389 Grand Street, Paterson, NJ 07505, 201-532-6220.

St. Paul's, Judith Blustein, 389 Grand Street, Paterson, NJ 07505, 201-532-6220.

Barrett House, Sisters Corita Dickinson, 905 13th Street, NW, Albuquerque, NM 87102, 505-243-4887.

The Salvation Army, Major LaVergen Nickerson, 501 Broadway S.E. Albuquerque, NM 87103, 505-247-0283.

The Salvation Army, Bonnie Evans, P.O. Box 381, Albuquerque, NM 87103, 505-242-3112.

The Salvation Army, Captain Bob Chase, 131 Washington Street, Binghamton, NY 13901, 607-722-2987.

Center for the Elimination of Violence, Lauren Farber, P.O. Box 279, Brooklyn, NY 11220, 718-439-4612.

The Salvation Army, Nancy Aikens, 960 Main Street, Buffalo, NY 14202, 716-883-9800.

Providence House, Inc., Sister Mary Ross, 159-23 89 Avenue, Jamaica, NY 11432, 718-739-1348.

The Salvation Army Family Shelter, Sharon M. Sciandra, 6 Broadhead Avenue, Jamestown, NY 14701, 716-483-0830.

Miracle Provider Church, Rev. Carrie Huggins, P.O. Box 827, New York, NY, 212-515-2288.

Sanctuary for Families, Cara Bagreder, P.O. Box 413, New York, NY 10108, 212-582-2091.

The Salvation Army, Lt. Ronald Winters, 117 Nelson Avenue, Peekskill, NY 10566, 914-737-0280.

The Salvation Army, Barbara Wagner, P.O. Box 41210, Rochester, NY 14604, 716-546-3944.

The Salvation Army Genesis House, Barbara Wagner, P.O. Box 41210, Rochester, NY 14604, 716-546-3944.

The Salvation Army, Judith Gilligan, 749 S. Warren Street, Syracuse, NY 13202, 315-475-1688.

The Salvation Army Barnabas Progam, Nancy Woodlock, 749 S. Warren Street, Syracuse, NY 13202, 315-475-1688.

The Salvation Army Booth House, Nancy Woodlock, 749 S. Warren Street, Syracuse, NY 13202, 315-475-1688.

Salvation Army Citadel, Major Gray W. Miller, 190 S. Maple Street, Akron, OH 44302, 216-762-8481.

The Salvation Army, Alice Skirtz, 114 E. Central Parkway, Cincinnati, OH 45210, 513-762-5650.

Angeline Christian Home, Patricia Wolf, 3201 W. 73rd, Cleveland, OH 44102, 216-631-7518.

The Salvation Army Harbor Light, Mickie Oris, 1710 Prospect Avenue, Cleveland, OH 44115, 216-781-3773.

The Salvation Army Women's Shelter, Cindy Unrue, 2501 E. 22nd Street, Cleveland, OH 44115 216-861-1789.

Open Shelter, Inc., Kent R. Beittel, 370 West State Street, Columbus, OH 43215, 614-461-0407.

The Salvation Army, Anita Marshall Gallick, 340 East Fulton Street, Columbus, OH 43215, 614-221-6561.

The Salvation Army, Kay D'Amewood, 141 W. 5th Street, Dayton, OH 45402, 513-228-8241.

The Salvation Army, Lieutenant Michael Sheriff, 515/517 Putnam Avenue, Zanesville, OH 43702, 614-452-8350.

Homestreet, Inc., Sand H. Carlyle, 233 SE 6th Avenue, Hillboro, OR 99123, 503-640-9892.

Burnside Community Council, Pastor Pat Harkins, 313 E. Burnside, Portland, OR 97214, 503-230-1097.

N. Community Action Council, K.J. Dunahoo, 7506 N. Chicago, Portland, OR 97203, 503-286-8371.

Neighborhood House Inc., Toni Kovach, 7780 SW Capitol Highway, Portland, OR 97219, 503-246-1663.

Portland Action Committees Together, Judith M. Bowen, 3534 SE Main Street, Portland, OR 97214, 503-233-8491.

Urban League of Portland, Lana Danner, 10 North Russell Street, Portland, OR 97209, 503-280-2600.

McKeesport YWCA, Christine Moninger, 410 9th Street, McKeesport, PA 15132, 412-664-7146.

YMCA, Betty Heath and Patricia Daugherty, 523 Sinclair Street, McKeesport, PA 15132, 412-664-9168.

Bethlehem Haven, Carol Wallace, 620 Smithfield Street, Pittsburgh, PA 15222, 412-281-1811.

Centre Avenue YMCA, Jeff Campbell, 2621 Centre Avenue, Pittsburgh, PA 15219, 412-621-1762.

The Salvation Army Emergency Shelter, Major Robert Frye, 424 Third Avenue, Pittsburgh, PA 15219, 412-394-4819.

Womanspace East, Inc., A. Jean Owens, P.O. Box 5280, Pittsburgh, PA 15206, 412-441-7106.

Women's Center & Shelter of Greater Pittsburgh, Jaquelin Hazzard, P.O. Box 9024, Pittsburgh, PA 15224, 412-687-8005.

YWCA Bridge Housing, Laura Doherty, 305 Wood Street, Pittsburgh, PA 15222, 412-391-5100 ext 279.

YWCA Shelter, Mary Bufwack, 1608 Woodmont, Nashville, TN 37215, 615-297-8833.

Star of Hope Center, Donald Johnson, P.O. Box 4052, Houston, TX 77210, 713-227-8900.

Multi Service Center, 18220 96th NE, Bothell, WA 98011, 206-485-6521.

APPENDIX C

Waiting Lists for Public Housing in Nine Metropolitan Areas [1]

City and numbers of households on waiting list

Boston	12,500
Chicago	40,000+
Houston	7,000+
Los Angeles	27,000+
New York City	200,000+
Philadelphia	10,000+
San Francisco	11,912
Seattle	[2] 1,315
Washington, DC	11,728

[1] This information was provided by officials from nine metropolitan housing authorities in a telephone survey conducted by the Select Committee on Hunger in June 1986. These agencies were contacted because they are among the cities with the highest concentration of homeless persons.

[2] Waiting list has been closed since June 1986.

APPENDIX D

Memoranda From Massachusetts and Missouri State Food Stamp Agencies: Clarification of Eligibility of Homeless

(a): February 7, 1985 memorandum from the Massachusetts Office of Human Services, Department of Public Welfare, Associate Commissioner for Eligibility Operations to Assistance Payments Staff

(b): April 15, 1986 memorandum from the Massachusetts Office of Human Services, Department of Public Welfare, Associate Commissioner for Eligibility Operations to Assistance Payments Staff

(c): October 20, 1986 and December, 1986 memoranda from the Massachusetts Office of Human Services, Department of Public Welfare, Associate Commissioner for Eligibility Operations to local food stamp office directors.

(d): Letter from Jo-Ann Eccher, Director of Project Bread Hunger Hotline to shelter providers in Boston, Massachusetts

(e): August 6, 1985 memorandum from Missouri Department of Social Services, Division of Family Services Director to all regional and county food stamp offices

(f): June 27, 1986, "Making Food Stamps Available to the Homeless in Missouri", summary prepared for the House Select Committee on Hunger by Lutheran Family and Children's Services of Missouri

CHARLES M. ATKINS
Commissioner

The Commonwealth of Massachusetts
Executive Office of Human Services
Department of Public Welfare
600 Washington Street, Boston 02111

AP-85-6

DATE: 2/7/85

- [ ] AFDC
- [ ] GR
- [ ] MA
- [ ] SSI
- [x] PA FOOD STAMPS
- [x] NPA FOOD STAMPS
- [ ] OTHER _____

- [x] INFORMATIONAL
- [ ] SPECIAL PROJECTS
- [ ] CASE ACTION GUIDE
- [ ] ADMINISTRATIVE

TO: ASSISTANCE PAYMENTS STAFF

FROM: JOLIE BAIN PILLSBURY, ASSOCIATE COMMISSIONER FOR ELIGIBILITY OPERATIONS

RE: ELIGIBILITY OF HOMELESS HOUSEHOLDS IN THE FOOD STAMP PROGRAM

Background

Questions have been raised about the eligibility of homeless households in the Food Stamp Program. In addition, evidence exists that some offices are denying benefits to households, especially one-person households, solely because the housenold is homeless.

Purpose

The purpose of this memo is to clarify policy with regard to homeless households so that the policy is applied correctly and consistently.

Policy: residence

A household's eligibility cannot be denied solely because the household is homeless. Section 362.100 of the Food Stamp Program Manual states: "There is no durational residency or fixed residency requirement."

The only residency requirement, as stated in Section 362.100, is that the household apply at the office covering the geographical area in which the household lives.

Having cooking facilities is not a Program requirement.

Example: homeless household

A household is residing in a vehicle, park, hallway, doorstep, sidewalk, or abandoned building. These are examples of homeless households.

Example: eligibility

A recently evicted household living in its automobile for the last two days is otherwise eligible for the Food Stamp Program. This is an example of a household eligible for the Food Stamp Program, because eligibility cannot be denied solely because the household is homeless.

Example: non-eligibility

A recently evicted household has been living for the last two days in a shelter where three meals a day are provided. This is an example of a household not eligible for the Food Stamp Program. Although the household is homeless, it is otherwise ineligible for the Food Stamp Program because Section 361.240 (B) of the Food Stamp Program Manual states that residents of institutions where more than 50% of the meals are provided are not eligible for the Program.

Policy: residence verification

Verification of residence is necessary only when the residence information on the application is inconsistent with:

- statements made by the applicant,
- previous applications, and
- other information known to the Worker.

Verification of residence consists of documentary evidence containing the household's address.

Documentary evidence not available

If documentary evidence is not available, verify by one of the following:

- a collateral contact, written or verbal, with a social service agency, the police, soup kitchen staff, or shelter staff;
- a written statement signed by the household or by a person known to the household stating that the household lives in the area covered by the office in which it applied; or
- a home or site visit.

Providing a mailing address

The application form must contain the following information provided by the household:

- a description of where the household is actually living and
- a mailing address, if available to the household.

The household may use the mailing address of a person known to the household who lives in the geographical area covered by the office in which the household applied.

If the household cannot provide a mailing address, the following will be used with the Director's approval:

- the address of the local office, or
- a local post office box.

Other programs	Refer a homeless household to any Department benefit program which the household may be eligible for but not participating.
Additional information	Inform homeless households, certified for participation in the Food Stamp Program, to notify the office of changes in their living arrangements. Special provisions apply for expedited service. See Sections 365.800 through 365.830 of the Food Stamp Program Manual.

SK/LT/lt

CHARLES M ATKINS
Commissioner

The Commonwealth of Massachusetts
Executive Office of Human Services
Department of Public Welfare
180 Tremont Street, Boston 02111

☐ AFDC ☐ GR
☐ MA ☐ SSI
☒ PA FOOD STAMPS
☒ NPA FOOD STAMPS
☐ OTHER_____

☒ INFORMATIONAL
☐ SPECIAL PROJECTS
☐ CASE ACTION GUIDE
☐ ADMINISTRATIVE

AP-86- 18

DATE: 4/15/86

TO: ASSISTANCE PAYMENTS STAFF

FROM: JOLIE BAIN PILLSBURY, ASSOCIATE COMMISSIONER FOR ELIGIBILITY OPERATIONS

RE: FOOD STAMP ELIGIBILITY FOR HOMELESS INDIVIDUALS AND FAMILIES STAYING IN SHELTERS

Introduction

Homeless individuals and families have been denied food stamp benefits because they are either staying in shelters and/or obtaining meals from shelters.

The purpose of this memo is to clarify policy regarding food stamp eligibility for the homeless.

NOTE: Shelters for battered women and their children are not included in this memo. Residents of these shelters are eligible to receive food stamps.

Homeless individuals are eligible

Homeless individuals who are either staying in individual shelters or obtaining meals from individual shelters are eligible to receive food stamp benefits, if all other eligibility factors are met.

Individual shelters are shelters that provide a bed and/or food, when available, to "single" persons, not to families with children.

Food stamp eligibility for homeless individuals is based on the fact that individual shelters are not considered institutions because:

(Continued on next page)

Homeless individuals are eligible (continued)

- o individual shelters generally provide only one (1) meal per day;
- o usually the stay in an individual shelter is temporary (there is no reasonable certainty that a bed and meal will be available from one day to the next); and
- o the food served in an individual shelter does not always qualify as a "meal".

NOTE: Individuals who are staying in mixed shelters (shelters that provide beds and food to "single" persons as well as to families with children) may be eligible to receive food stamps, if all other eligibility factors are met and if the mixed shelter does not qualify as an institution. For cases where individuals are staying at a mixed shelter, the shelter must be evaluated according to the section in this memo entitled, "When is a family or mixed shelter not an institution?".

Homeless families may be eligible

Homeless families who are staying in family or mixed shelters may be eligible to receive food stamp benefits, if all other eligibility factors are met and if the family or mixed shelter does not qualify as an institution [see 106 CMR 361.240(B)].

A family shelter provides beds and food only to families with children, not to "single" persons.

When is a family or mixed shelter not an institution?

When the answer to the following question is yes, the family or mixed shelter is not considered to be an institution and, therefore, the persons staying in them may be eligible to receive food stamps.

(Continued on next page)

When is a family or mixed shelter not an institution? (continued)

Does the shelter provide its "residents" with less than 50% of their three (3) meals daily?

NOTE: A doughnut and coffee do not qualify as a "meal".

Responsibilities of local office directors/designees

The local office directors or their designees will:

- compile separate lists of the individual, family, and mixed shelters in their areas;

NOTE: The following agencies may be contacted to help determine what shelters are located in their areas:

  - local Community Action Program (CAP) agencies;
  - the Department of Social Services (DSS);
  - local police departments; and
  - the Homeless Unit at Central Office (617-574-0340).

- evaluate each family and mixed shelter to determine which are not considered institutions and indicate this on the lists;

NOTE: Any questions regarding what constitutes a "meal" should be directed to the Hotline at 617-574-0402.

- periodically update the lists to keep them current; and
- make the lists available to all workers in their respective offices.

Effective date

This material is effective immediately.

The Commonwealth of Massachusetts
Executive Office of Human Services
Department of Public Welfare
180 Tremont Street, Boston 02111

CHARLES M. ATKINS
Commissioner

October 20, 1986

TO: Local Office Directors

FROM: Jolie Bain Pillsbury
Associate Commissioner For Eligibility Operations

RE: Continued Denial Of Application For Food Stamps

Questions still continue in regard to the eligibility of clients, especially homeless, in the Food Stamp Program. Many offices continue to issue conflicting information regarding current food stamp regulations. Of concern are the following policy issues:

- Regulation 362.100 states: "there is no durational residency or fixed residency requirement." However, clients are told: you must have an address in order to apply.
- Having cooking facilities is not a program requirement. Some workers are stating that an applicant must have cooking facilities.
- Regulation 365.810 B states: "Social Security requirements of Section 362.500 do not have to be met before expedited service is provided. These requirements must be met before the household's next issuance." However, clients seeking EA under the Food Stamp Program are being told they must have two forms of I.D., one of which must be a Social Security Card.
- Regulation 362.100 states that households apply at the office covering the geographical area in which the household lives. Many clients in the Greater Boston Area are being sent to the Hawkins Street Homeless Unit to apply for food stamps, as opposed to receiving services at their local office.

Attached are AP memos AP-85-6 (2/7/85) and AP-86-18 (4/15/86) emphasizing the issue of homeless and their eligibility for food stamps, even without a fixed residency. It is hoped that this will clarify policy with regard to homeless households so that policy is applied correctly and consistently.

JA/jr

December 1986

POLICY AND PROCEDURE ISSUANCE LIST

F.Y.I.

FOOD STAMP ELIGIBILITY AND APPLICATION FOR HOMELESS INDIVIDUALS AND FAMILIES

The Department has been advised that homeless individuals have encountered numerous barriers when applying and being certified for the Food Stamp Program. Therefore, the following items review certain policies pertaining to the food stamp application process.

- **Do not deny an application because there is no permanent address or verification of residency.** A permanent address or verification of residency, such as rent receipts, is not required. (106 CMR 362.100)

- **Do not require two forms of identification at application.** Only one form of personal identification is required. (106 CMR 361.640)

- **Do not require a Social Security card or number at application.** For expedited service, the SSN requirements must be met before the next issuance. (106 CMR 362.500)

  For nonexpedited service, the SSN requirements must be met before initial certification (first issuance).

- **Do not require that the individual or family have access to cooking facilities.** (106 CMR 360.100)

- **Do not make the individual or family apply for other Public Assistance benefits as a condition of food stamp eligibility.** However, you should inform homeless individuals and families that they may be eligible for other Department benefits and refer them to the appropriate Worker if they wish to apply for those benefits.

- **Do not send homeless individuals or families to a particular local office. For example, City of Boston residents should not be sent to Hawkins Street because it houses the Homeless Unit or to Church Street because it is near the Pine Street Inn to apply for food stamps.** Applicants are to apply at the local office serving the geographic area in which the applicant resides. (106 CMR 361.110)

- **Do refer to AP-85-6 "ELIGIBILITY OF HOMELESS HOUSEHOLDS IN THE FOOD STAMP PROGRAM" and AP-86-18 "FOOD STAMP ELIGIBILITY FOR HOMELESS INDIVIDUALS AND FAMILIES STAYING IN SHELTERS" for additional informatiom about food stamp eligibility for homeless individuals and families.**

PROJECT BREAD
HUNGER HOTLINE
5237010
14 Beacon St., Rm 608, Boston, MA 02108

May 8, 1986

Dear Shelter Provider;

The Department of Public Welfare, responding to advocacy efforts of the Project Bread Hunger Hotline, Massachusetts Law Reform and the Planning Committee of the Governor's Advisory Committee on Homelessness, has issued a policy clarification on food stamp eligibility for homeless individuals and families staying in shelters.

Homeless individuals and families have been denied food stamp benefits simply because they stay in shelters and/or obtain their meals from shelters. Federal regulations denies food stamp benefits to individuals who reside in institutions and receive 50% of their meals from the institution.

The Project Bread Hunger Hotline challenged this for two reasons. One homeless shelters are not institutions where an individual is guaranteed the certainty of a bed. Two,the food served at shelters many times does not "nutritionally" constitute a meal as defined by the United States Department of Agriculture.

The policy memo, AP-86-18, issued by the Department of Public Welfare states that homeless individuals who are either staying in individual shelters or obtaining their meals from a shelter <u>are</u> eligible to receive food stamp benefits. This is based on the fact that individual(adult) shelters are not institutions because there is no reasonable certainty that a bed and meal while be available from one day to the next and that the food served at the shelter does not always qualify as a meal.

Homeless families living in family shelters and individual homeless adults living in mixed shelters may be eligible for food stamp benefits if the family or mixed shelter provides the shelter guest with less than 50% of their three (3) meals daily.

A copy of the memo has been enclosed for review. Now that the memo has been issued it is very important for shelter providers and advocates to ensure that homeless individuals and families staying in shelters are not denied their right to participate in the food stamp program. If you find that guest at your shelter are being denied food stamps please notify the Project Bread Food Stamp Hotline at 1-800-645-8333.
Thank you.

Sincerely;
Jo-Ann Eccher/Director

A voice for the hungry

IM-121
1984

DEPARTMENT OF SOCIAL SERVICES

DIVISION OF FAMILY SERVICES

Broadway State Office Building

JEFFERSON CITY, MISSOURI

August 6, 1984

M E M O R A N D U M

TO: ALL REGIONAL AND COUNTY OFFICES

FROM: JOSEPH J. O'HARA, DIRECTOR Joseph J O'Hara

SUBJECT: FOOD STAMP MANUAL REVISION # 32, SECTION II, PAGES 1, 5a, 8 AND 13; SECTION IV, PAGE 23

DISCUSSION:

The revisions attached to this memorandum are to insert reminders in the Food Stamp manual regarding eligibility of the homeless person.

Section II, page 1: Residency now includes a reference to the homeless person.

Section II, page 5a: The opening paragraph of household definition now includes a reference to the homeless person.

Section II, page 8: Policy regarding institutional residence has been clarified in regard to the homeless person.

Section II, page 13: The procedures for work registration include the requirement for special arrangements with the homeless person to assure non-compliance does not occur due to the lack of a permanent address.

Section IV, page 23: An item XI has been added to clarify procedures for getting the issuance to the homeless person. County offices should set up a process for complying with these procedures and establish controls which will account for the delivery of the coupons.

Revisions in other material on the pages listed above have not been made. As the Food Stamp manual is revised due to ICE implementation, these pages will be corrected.

NECESSARY ACTION:

Review this memorandum with staff immediately.

File this revision within 15 days of receipt.

SR

NON-FINANCIAL ELIGIBILITY REQUIREMENTS

I. RESIDENCY

A. Definition

There is no durational residency requirement for Food Stamps. Applicants must live in the county in which they are applying. Applicants who maintain a residence in the county for any purpose other than a vacation, regardless of the length of time they have resided in the area, will be considered eligible on the residency factor. For example, elderly individuals who spend a portion of the year with friends or relatives would not be considered vacationers. No individual may participate as a member of more than one household or in more than one project area in any month. Intent to permanently remain in the county or state will not be a condition of eligibility. A fixed residence is not required. Homeless persons and migrant living in campsites meet the residency requirement.

B. Verification of Residence

1. Residency shall be verified except in unusual cases (such as some migrant farmworker households, some homeless situations or households newly arrived in a project area) where verification of residency cannot reasonably be accomplished. Verification of residency should be accomplished to the extent possible in conjunction with the verification of other information such as, but not limited to, rent and mortgage payments, utility expenses and identity. If verification cannot be accomplished in conjunction with the verification of other information, collateral contact or other readily available documentary evidence must be used. Documents used to verify other factors of eligibility should normally suffice to also verify residency. Any documents or collateral contact which reasonably establishes the applicant's residency must be accepted and no requirement for a specific type of verification may be imposed.

2. If residency is questioned, the household may supply the verification in the form of documentation such as a driver's license, utility or other recently received bill, voter registration card, or similar means. This information may be further substantiated by reference to an independent source such as a telephone or city directory, detailed area map, contact with landlord or neighbor, or, if necessary, a home visit.

II. CITIZENSHIP AND ALIEN STATUS

A. Definition

To be eligible for food stamps, household members must be either

1. Citizens of the United States.

2. Aliens lawfully admitted for permanent residence as immigrants pursuant to sections 101(a)(15) and 101(a)(20) of the Immigration and Nationality Act.

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Some aliens may be lawfully admitted but only for a temporary or specific period of time with no intention of abandoning their residence in a foreign country. Such aliens are:

1. Students,

2. Tourists,

3. Visitors, and

4. Some workers and diplomats.

Aliens in this group are not eligible for food stamps because of the temporary nature of their admission status. Although these aliens are not eligible for food stamps, this will not affect the eligibility of

H. Reporting Illegal Aliens

1. The agency shall immediately inform the local INS office of any member(s) of a household who is determined to be ineligible to receive food stamps because the member(s) is present in the United States in violation of the Immigration and Nationality Act.

2. When a household indicates inability or unwillingness to provide documentation of alien status for any household member, that member should be classified as an ineligible alien.

3. When a person indicates inability or unwillingness to provide documentation of alien status, that person should be classified as an ineligible alien. In such cases the caseworker shall not continue efforts to obtain that documentation.

4. When the caseworker determines that a household member(s) is an ineligible alien and should be reported to INS, documentation must be entered on the IM-102.

III. HOUSEHOLD DETERMINATION

A. Household Defined

A household may be composed of any of the following individuals or groups of individuals (including the homeless person(s), provided that they are not residents of an institution, except those institutions authorized to participate in the program, or residents of a commercial boarding house:

1. An individual who:

a. Lives alone and purchases and prepares food for home consumption.

b. Lives with others but who customarily purchases food and prepares meals for home consumption separate and apart from the others.

c. An individual who is 60 years of age or older, living with others, (and spouse of such individual) who is unable to purchase and prepare meals because he/she suffers from a disability considered permanent under the Social Security Act or suffers from a non disease related severe, permanent disability. However, the countable income of the others with whom the individual resides (excluding the income of such individual's spouse) cannot exceed 165% of the poverty level. (See table below). This countable income shall be the gross income of the others with whom the individual resides determined as if they were applying to participate in the Food Stamp program.

a. Children under 18 years of age under the parental control of a member of the household

b. Parents living with their natural, adopted or step-children, unless at least one parent meets the definition of elderly or disabled (see Section I).

Note: Disabled persons who requested and were denied separate household status on or after September 8, 1982, will be entitled to benefits retroactive to the dates of their applications for separate household status.

c. A spouse of a member of the household. Refer to Section I "Definitions", for the definition of spouse.

d. A boarder.

e. Siblings (natural, adopted, half or step brothers and sisters), unless at least one sibling meets the definition of elderly or disabled. (See Section I).

In most cases the household's statement regarding household status will be accepted. In questionable instances, the final decision is the judgment of the caseworker in evaluating information to determine household status. The following are some additional items that may be considered in making a final determination.

a. How are the household expenses met?

b. Are meals cooked and eaten in common and do all members eat similar food?

c. Do other reasonable considerations, such as illness or special diet of a household member, make the decision to classify the household as separate logical.

On initial applications for households who claim separate household status and have no income, the worker must obtain the household's statement that food will be purchased and prepared separately. The worker must use judgment in approving the household. The worker's reason for approval of separate household status must be thoroughly explained on the IM-102.

B. Non-Household Members

For food stamp purposes the following members residing in a household will not be considered in determining eligibility or coupon allotment. Non-household members who are otherwise eligible may participate in the program as separate households.

1. Commercial Boarding Houses - Residents of commercial boarding houses are ineligible for program benefits. A boarding house is defined as an establishment which is licensed as a commercial enterprise which offers meals and lodging for compensation with the intent of making a profit. The number of boarders living in the boarding home will be used in establishing the commercial or non-commercial status of a boarding home. If the boarding home is not licensed, it must be in the business with the intent of making a profit.

2. Institutions - Residents of an institution which provides them with a majority of their meals (over 50% of three meals daily) as a part of its normal service and which has not been authorized to accept coupons by USDA are not eligible for participation with the exceptions listed below. Provision of over 50% of three meals on one or more days during the issuance month will not cause a homeless person to be considered a resident of an institution unless that person is also living at the institution and the number of meals provided equal more than 50% throughout the issuance month.

   Residents of the following institutions will be eligible for Food Stamps if the institution is providing the majority of their meals and is authorized by USDA to accept coupons:

   a. Residents of federally subsidized housing for the elderly, Section 202 of 236 of HUD.

   b. An addict or alcoholic who is a resident of a treatment or rehabilitation center.

   c. Boarding schools are considered as institutions. If the individual or individual's family can show nonresidence in the institution (i.e., the majority of the meals are not eaten at the institution) the individual can then be considered a household member for food stamp purposes.

      Special consideration should be given to summer vacation, spring (Easter) break, Christmas break, etc. This would allow the individual to be included in the coupon allotment due to increase in household size during these periods.

3. Roomers - Individuals to whom a household furnishes lodging, but not meals for compensation.

4. Boarders - A boarder is defined as an individual residing in the household and paying reasonable compensation to the household for lodging and meals. Boarders are ineligible to

participate in the Food Stamp Program independent of the household providing the board. Boarders may participate as members of the household providing the boarder services, at such household's request. If an applicant household identifies any individual in the household as a boarder the following provisions apply.

a. Boarder status will not be applied to:

1. A spouse as defined in Section I, Definitions, of a household member.

2. Children under 18 years of age who are under the parental control of a household member.

3. Parents living with their natural, adopted or step children or such children living with such parents, unless at least one parent meets the definition of elderly or disabled.

4. Siblings (natural, adopted, half or step brothers or sisters), unless at least one sibling meets the definition of elderly or disabled.

5. Persons paying less than a reasonable monthly payment for meals. An individual furnished both meals and lodging by the household, but

paying compensation of less than a reasonable amount, will be considered a member of the household meals and lodging. When the boarder's payments for room are distinguishable from the payments for meals, only the amount paid for meals will be evaluated to determine if reasonable compensation is being paid for meals. The reasonable monthly payments must be paid in cash. In no event shall food stamps be paid for meals and credited toward monthly payments. A reasonable monthly payment shall be either of the following:

(a) Boarders whose board arrangement is for more than two meals per day shall pay an amount which equals for exceeds the value of the coupon allotment for the appropriate size of the boarder household, or

(b) Boarders whose board arrangement is for two meals or less per day shall pay an amount which equals or exceeds two-thirds of the value of the coupon allotment for the appropriate size of the boarder household.

b. Boarders shall not be considered a member of the household, nor shall the income and resources of the boarders be considered available to such household. However, the amount of payment that the boarder gives to the household for lodging and meals shall be treated as self-employment income to the applicant household. (See Section III - "Income From Boarders" for handling self-employment income from boarders in non-commercial boarding house. The procedures for handling income received from boarders in a commercial boarding home are contained in Section III - "Income to Self-Employed Household").

5. Elderly Individual Unable to Purchase and Prepare Own Meals - The following individuals may opt to be considered non-household members. An individual age 60 or older living with others (and spouse of such an individual) who is unable to pruchase and prepare meals because he/she suffers from a disability considered permanent or suffers from a non-disease related severe, permanent disability if that individual (and spouse of such individual) have income in excess of Food Stamp requirements.

6. Live-In Attendant - Defined as an individual who lives in the household to provide medical care, housekeeping services, child care, or other similar personal services for compensation.

7. Others - Other individuals who share living quarters with the household but who do not customarily purchase food and prepare meals with the household.

C. Excluded Household Members

The following individuals residing in a household will not be included in determining eligibility or coupon allotment. However, the income and resources of excluded household members shall be considered available to the remaining household members as outlined below. Excluded household members may not participate in the program as separate households.

1. Ineligible Aliens - Individuals who do not meet the citizenship or eligible alien requirements. Resources of ineligible aliens shall be counted as

available to the remaining household members. The income of an ineligible alien shall be counted as income to the household less a prorata share for the ineligible alien.

That portion of the household's allowable Shelter and Dependent Care expenses which are either paid by or billed to the excluded members shall be divided evenly among the household members including the excluded members. All but the excluded member's share is counted as a deductible expense for the remaining household members. (Refer to Section III - Treatment of Earned Income of Disqualified Members).

2. Individuals Disqualified for Failure to Provide a SSN - Resources of these individuals shall be counted as available to the remaining household members. Income of these individuals shall be counted as income to the household less a prorata share for the disqualified individual.

   That portion of the household's allowable Shelter and Dependent Care expenses which are either paid by or billed to the excluded members shall be divided evenly among the household members including the excluded members. All but the excluded member's share is counted as a deductible expense for the remaining household members. (Refer to Section III - Treatment of Earned Income of Disqualified Members).

3. Individuals Disqualified for Intentional Program Violations - Resources and income of these individuals shall be attributed in their entirety to the remaining household members. The household's entire allowable earned income, standard medical, dependent care and excess shelter deductions shall continue to apply to the remaining household. (Refer to Section III, - Earned Income Treatment of Income of Disqualified Members).

4. Individuals Disqualified for Failure to Comply with Workfare Requirements - Resources and earned and unearned income of these individuals shall be attributed in their entirety to the remaining household members. The household's entire allowable earned income, standard, medical, dependent care and excess shelter deductions shall continue to apply to the remaining household. (Refer to Section III, page 52 - Earned Income Treatment of Income of Disqualified Members).

D. Verification of Household Composition Factors

1. The worker will verify the household's status only if it is questionable and would affect the household's eligibility or benefit level. To be considered questionable, the information on the application must be inconsistent with statements made by the applicant, inconsistent with other information on the application or previous applications, or inconsistent with information received by the agency.

2. If questionable, the worker will verify any factors affecting the composition of the household such as household size and boarder status. However, due to the difficulty in verifying whether or not a group of individuals customarily purchases and prepares meals together and therefore, constitutes a household, workers shall generally accept the household's statement regarding food preparation and purchasing.

2. Procedure

a. For those household members who are required to register, the following procedures will be used:

(1) The caseworker will explain to the applicant both the work registration and job search requirement and the consequences of failure to comply. If the person is homeless, special arrangements must be made with the person to assure there is no non-compliance cited due to the lack of a permanent address.

(2) The person(s) must complete the work registration form (IM-101).

(3) Registration is considered to be completed when the form IM-101 has been completed by or for each person in the household not otherwise exempt and reviewed by the caseworker for completeness.

(4) For those person(s) required to complete work registration for AFDC, the MA5-95 can be used to fulfill the food stamp work registration requirement. If the MA-95 is used, a copy from the IM case must be filed in the food stamp section. If an emergency exists and there is a delay in WIN registration, the IM-101 must be used.

(5) The original (IM-101) must be filed in the case record. If the MA5-95 is used, a copy will be filed in the record.

(6) The carbon copies (IM-101) must be submitted to MSES at the time of approval, reapproval, employment status change, or six month registration period.

(7) MSES will screen the IM-101 and determine which referrals they will accept. This determination will be based on employment history, work skills, and current job openings. If the referral is not accepted by MSES, they will make a notation in Section C of the IM-101 and return it to the county office. This form must be filed in the household case record.

(8) If Section C of the IM-101, returned from MSES, is marked "handicapped", the caseworker should determine exemption as outlined in procedures for household members who are physically and mentally incapable of engaging in gainful employment.

(9) Employment Security will evaluate each IM-101 and determine the household member(s) which will be provided Job Search services.

b. Reregistration for reapplication is considered to be completed upon a determination the initial registration on file with MSES is less than six (6) months old, and the information is unchanged.

(1) Such determination will be made after a review by the caseworker of the response on the IM-101, Section C.

(2) If there is no change in information, MSES need not be notified.

(3) If there has been a change in employment status, MSES should be notified by IM-101 showing:

(a) Identity of registrant;

(b) Identity of household;

(c) Change which has occurred.

This report only provides current information to MSES. It does not change the date of initial registration. Work registration will require a new and complete IM-101 at the end of a six-month registration period.

3. Recording

a. For those household members who are not required to register, the worker will record the person's name and the reason for exemption on the IM-102 and any verification obtained, if verification is required.

b. For those household members who are required to register, the worker will record the person's name and the date registered on the IM-102.

4. Additional Requirements

Household members who are required to register must also:

a. Report for an interview to the Employment Security Office where he/she is registered upon reasonable request by MSES.

b. Respond to a request from the Employment Security Office requiring supplemental information regarding employment status or availability for work.

c. Report to an employer to whom he/she has been referred by MSES if the potential employment meets the suitability requirements described in paragraph D. of this section.

d. Accept a bona fide offer of suitable employment to which he/she is referred by MSES (see Suitability of Work).

e. Continue suitable employment to which he/she was referred by MSES until:

(1) The employment is no longer considered suitable, or

(2) The household member becomes exempt from work registration, or

(3) The household member is terminated from employment due to circumstances beyond his/her control. When a person is habitually late, has poor attendance, or his/her work is poor, and it appears this is deliberate, the worker must talk with the employer. If, in the worker's judgment, the household member caused the termination, the household will be ineligible. The case must be

4. After two reports by a household of non-delivery of either full or partial allotments in the mail (these may be reports of non-delivery of an original or a replacement allotment) the following procedures will be utilized.

   a. The State Office Mail Issuance Unit will automatically place the household on CERTIFIED MAIL method of delivery for a three month period or longer upon written request by the county office.

      Note! Certified Mail method of delivery includes returned request to the State Office Mail Issuance Unit and restricted delivery. Restricted delivery means that the envelope can only be received by and signed for by the person to which the envelope is addressed or their authorized agent designated on Postal Form 3849.

   b. Certified Mail replacements will not routinely be made until non-delivery/receipt has been verified.

   c. The County Office may send an IOC to the State Office Mail Issuance Unit to request that coupons be sent by certified mail when the automatic situation has not occurred and the County Office or the household has cause to justify certified mail method of delivery. The IOC must include households name, case number, bonus amount, type of payroll, and period of time certified mail is to be used.

   d. The County Office may also send an IOC to the MI Unit to request that coupons be sent to the county office for the household to pick up. The IOC shall include the same information as in c. above. This procedure shall be limited to special circumstances when the household has no permanent address or circumstances that prohibit receiving an signing for certified mail.

      Under these procedures if the household does not pick up their coupons during the period of intended use, the county office will return coupons to the State Office Mail Issuance Unit (P.O. Box 310, Jefferson City, MO 65102) on the first working day following the period of intended use for coupons.

      Note: If the State Office Mail Issuance Replacement Log reveals requests for replacements more than twice in a 6 month period or repeated requests from the same household, the household's future coupon allotment will automatically be sent by certified mail for a 3 month period or until the end of the certification period, whichever occurs first. If certified mail procedures are necessary, notification to the County Office will be recorded in the "Remarks" section of the IM-113. If the County Office wishes an extension beyond the 3 month period, an IOC must be sent to the Mail Issuance Unit requesting the extension.

D. ATP Card Issue Counties: St. Louis City, St. Louis County and Jackson County are designated as ATP Card issue counties. There will be no direct mail coupon issuance in these counties.

E. ATP Card Issue Counties - Mail Issuance Option: In these three (3) counties recipients have an option of obtaining their coupons from an issuer (post office, bank, and etc.) or:

Recipients may sign their ATP card and return it by mail to the State Office Mail Issuance Unit. The Mail Issuance Unit will, upon receipt of the properly signed ATP, mail the household their coupon allotment. Included with the coupon allotment will be an instructional notice should the recipient elect mail issue option in the following month.

This option is in effect in these three (3) counties with following restrictions:

The Mail Issuance Option is restricted to households comprised of elderly or disabled and homebounds in St. Louis City, and in selected zip codes in St. Louis County and Jackson County due to being designated as high risk mail areas the U.S. Postal Inspection Service. Restricted zip codes in St. Louis County and Jackson County are:

St. Louis County - 63114, 63121, 63130, 63133, 63134, 63135, 63136, 63140, and 62145.

Jackson County - 64106, 64124, 64127, 64111, 64109, 64128, and 64130.

XI. ISSUANCE PROCEDURES FOR HOMELESS PERSONS

If a homeless person is being approved for Food Stamps, the address of the county office will be entered on the IM-105. An IOC will be prepared requesting that the issuance be sent to the county office for the homeless person to pick up. If the county is a mail issuance county, this IOC will be sent to the Food Stamp Mail Issuance Unit. If the county is an ATP county, this IOC will be sent to the Food Stamp Data Management Unit. The address for both units is P.O. Box 310, Jefferson City, MO 65102-0301.

If the homeless person does not pick up his/her coupons, the coupons will be returned to the Food Stamp Mail Issuance Unit on the first working day following the period of intended use. If the homeless person does not pick up the ATP card, the ATP card will be returned to the Food Stamp Data Management Unit on the first working day following the period of intended use.

IM-121
1984

DEPARTMENT OF SOCIAL SERVICES

DIVISION OF FAMILY SERVICES

Broadway State Office Building

JEFFERSON CITY, MISSOURI

August 6, 1984

M E M O R A N D U M

TO: ALL REGIONAL AND COUNTY OFFICES

FROM: JOSEPH J. O'HARA, DIRECTOR Joseph J O'Hara

SUBJECT: FOOD STAMP MANUAL REVISION # 32, SECTION II, PAGES 1, 5a, 8 AND 13; SECTION IV, PAGE 23

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NECESSARY ACTION:

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a. Lives alone and purchases and prepares food for home consumption.

b. Lives with others but who customarily purchases food and prepares meals for home consumption separate and apart from the others.

c. An individual who is 60 years of age or older, living with others, (and spouse of such individual) who is unable to purchase and prepare meals because he/she suffers from a disability considered permanent under the Social Security Act or suffers from a non disease related severe, permanent disability. However, the countable income of the others with whom the individual resides (excluding the income of such individual's spouse) cannot exceed 165% of the poverty level. (See table below). This countable income shall be the gross income of the others with whom the individual resides determined as if they were applying to participate in the Food Stamp program.

a. Children under 18 years of age under the parental control of a member of the household

b. Parents living with their natural, adopted or step-children, unless at least one parent meets the definition of elderly or disabled (see Section I).

Note: Disabled persons who requested and were denied separate household status on or after September 8, 1982, will be entitled to benefits retroactive to the dates of their applications for separate household status.

c. A spouse of a member of the household. Refer to Section I "Definitions", for the definition of spouse.

d. A boarder.

e. Siblings (natural, adopted, half or step brothers and sisters), unless at least one sibling meets the definition of elderly or disabled. (See Section I).

In most cases the household's statement regarding household status will be accepted. In questionable instances, the final decision is the judgment of the caseworker in evaluating information to determine household status. The following are some additional items that may be considered in making a final determination.

a. How are the household expenses met?

b. Are meals cooked and eaten in common and do all members eat similar food?

c. Do other reasonable considerations, such as illness or special diet of a household member, make the decision to classify the household as separate logical.

On initial applications for households who claim separate household status and have no income, the worker must obtain the household's statement that food will be purchased and prepared separately. The worker must use judgment in approving the household. The worker's reason for approval of separate household status must be thoroughly explained on the IM-102.

B. Non-Household Members

For food stamp purposes the following members residing in a household will not be considered in determining eligibility or coupon allotment. Non-household members who are otherwise eligible may participate in the program as separate households.

69-775 O - 87 - 4

1. Commercial Boarding Houses - Residents of commercial boarding houses are ineligible for program benefits. A boarding house is defined as an establishment which is licensed as a commercial enterprise which offers meals and lodging for compensation with the intent of making a profit. The number of boarders living in the boarding home will be used in establishing the commercial or non-commercial status of a boarding home. If the boarding home is not licensed, it must be in the business with the intent of making a profit.

2. Institutions - Residents of an institution which provides them with a majority of their meals (over 50% of three meals daily) as a part of its normal service and which has not been authorized to accept coupons by USDA are not eligible for participation with the exceptions listed below. Provision of over 50% of three meals on one or more days during the issuance month will not cause a homeless person to be considered a resident of an institution unless that person is also living at the institution and the number of meals provided equal more than 50% throughout the issuance month.

   Residents of the following institutions will be eligible for Food Stamps if the institution is providing the majority of their meals and is authorized by USDA to accept coupons:

   a. Residents of federally subsidized housing for the elderly, Section 202 of 236 of HUD.

   b. An addict or alcoholic who is a resident of a treatment or rehabilitation center.

   c. Boarding schools are considered as institutions. If the individual or individual's family can show nonresidence in the institution (i.e., the majority of the meals are not eaten at the institution) the individual can then be considered a household member for food stamp purposes.

      Special consideration should be given to summer vacation, spring (Easter) break, Christmas break, etc. This would allow the individual to be included in the coupon allotment due to increase in household size during these periods.

3. Roomers - Individuals to whom a household furnishes lodging, but not meals for compensation.

4. Boarders - A boarder is defined as an individual residing in the household and paying reasonable compensation to the household for lodging and meals. Boarders are ineligible to

participate in the Food Stamp Program independent of the household providing the board. Boarders may participate as members of the household providing the boarder services, at such household's request. If an applicant household identifies any individual in the household as a boarder the following provisions apply.

a. Boarder status will not be applied to:

1. A spouse as defined in Section I, Definitions, of a household member.

2. Children under 18 years of age who are under the parental control of a household member.

3. Parents living with their natural, adopted or step children or such children living with such parents, unless at least one parent meets the definition of elderly or disabled.

4. Siblings (natural, adopted, half or step brothers or sisters), unless at least one sibling meets the definition of elderly or disabled.

5. Persons paying less than a reasonable monthly payment for meals. An individual furnished both meals and lodging by the household, but

paying compensation of less than a reasonable amount, will be considered a member of the household meals and lodging. When the boarder's payments for room are distinguishable from the payments for meals, only the amount paid for meals will be evaluated to determine if reasonable compensation is being paid for meals. The reasonable monthly payments must be paid in cash. In no event shall food stamps be paid for meals and credited toward monthly payments. A reasonable monthly payment shall be either of the following:

(a) Boarders whose board arrangement is for more than two meals per day shall pay an amount which equals for exceeds the value of che coupon allotment for the appropriate size of the boarder household, or

(b) Boarders whose board arrangement is for two meals or less per day shall pay an amount which equals or exceeds two-thirds of the value of the coupon allotment for the appropriate size of the boarder household.

b. Boarders shall not be considered a member of the household, nor shall the income and resources of the boarders be considered available to such household. However, the amount of payment that the boarder gives to the household for lodging and meals shall be treated as self-employment income to the applicant household. (See Section III - "Income From Boarders" for handling self-employment income from boarders in non-commercial boarding house. The procedures for handling income received from boarders in a commercial boarding home are contained in Section III - "Income to Self-Employed Household").

5. Elderly Individual Unable to Purchase and Prepare Own Meals - The following individuals may opt to be considered non-household members. An individual age 60 or older living with others (and spouse of such an individual) who is unable to pruchase and prepare meals because he/she suffers from a disability considered permanent or suffers from a non-disease related aevere, permanent disability if that individual (and spouse of such individual) have income in excess of Food Stamp requirements.

6. Live-In Attendant - Defined as an individual who lives in the household to provide medical care, housekeeping services, child care, or other similar personal services for compensation.

7. Others - Other individuals who share living quarters with the household but who do not customarily purchase food and prepare meals with the household.

C. Excluded Household Members

The following individuals residing in a household will not be included in determining eligibility or coupon allotment. However, the income and resources of excluded household members shall be considered available to the remaining household members as outlined below. Excluded household members may not participate in the program as separate households.

1. Ineligible Aliens - Individuals who do not meet the citizenship or eligible alien requirements. Resources of ineligible aliens shall be counted as

available to the remaining household members. The income of an ineligible alien shall be counted as income to the household less a prorata share for the ineligible alien.

That portion of the household's allowable Shelter and Dependent Care expenses which are either paid by or billed to the excluded members shall be divided evenly among the household members including the excluded members. All but the excluded member's share is counted as a deductible expense for the remaining household members. (Refer to Section III - Treatment of Earned Income of Disqualified Members).

2. Individuals Disqualified for Failure to Provide a SSN - Resources of these individuals shall be counted as available to the remaining household members. Income of these individuals shall be counted as income to the household less a prorata share for the disqualified individual.

   That portion of the household's allowable Shelter and Dependent Care expenses which are either paid by or billed to the excluded members shall be divided evenly among the household members including the excluded members. All but the excluded member's share is counted as a deductible expense for the remaining household members. (Refer to Section III - Treatment of Earned Income of Disqualified Members).

3. Individuals Disqualified for Intentional Program Violations - Resources and income of these individuals shall be attributed in their entirety to the remaining household members. The household's entire allowable earned income, standard medical, dependent care and excess shelter deductions shall continue to apply to the remaining household. (Refer to Section III, - Earned Income Treatment of Income of Disqualified Members).

4. Individuals Disqualified for Failure to Comply with Workfare Requirements - Resources and earned and unearned income of these individuals shall be attributed in their entirety to the remaining household members. The household's entire allowable earned income, standard, medical, dependent care and excess shelter deductions shall continue to apply to the remaining household. (Refer to Section III, page 52 - Earned Income Treatment of Income of Disqualified Members).

D. Verification of Household Composition Factors

1. The worker will verify the household's status only if it is questionable and would affect the household's eligibility or benefit level. To be considered questionable, the information on the application must be inconsistent with statements made by the applicant, inconsistent with other information on the application or previous applications, or inconsistent with information received by the agency.

2. If questionable, the worker will verify any factors affecting the composition of the household such as household size and boarder status. However, due to the difficulty in verifying whether or not a group of individuals customarily purchases and prepares meals together and therefore, constitutes a household, workers shall generally accept the household's statement regarding food preparation and purchasing.

2. Procedure

a. For those household members who are required to register, the following procedures will be used:

(1) The caseworker will explain to the applicant both the work registration and job search requirement and the consequences of failure to comply. If the person is homeless, special arrangements must be made with the person to assure there is no non-compliance cited due to the lack of a permanent address.

(2) The person(s) must complete the work registration form (IM-101).

(3) Registration is considered to be completed when the form IM-101 has been completed by or for each person in the household not otherwise exempt and reviewed by the caseworker for completeness.

(4) For those person(s) required to complete work registration for AFDC, the MA5-95 can be used to fulfill the food stamp work registration requirement. If the MA-95 is used, a copy from the IM case must be filed in the food stamp section. If an emergency exists and there is a delay in WIN registration, the IM-101 must be used.

(5) The original (IM-101) must be filed in the case record. If the MA5-95 is used, a copy will be filed in the record.

(6) The carbon copies (IM-101) must be submitted to MSES at the time of approval, reapproval, employment status change, or six month registration period.

(7) MSES will screen the IM-101 and determine which referrals they will accept. This determination will be based on employment history, work skills, and current job openings. If the referral is not accepted by MSES, they will make a notation in Section C of the IM-101 and return it to the county office. This form must be filed in the household case record.

(8) If Section C of the IM-101, returned from MSES, is marked "handicapped", the caseworker should determine exemption as outlined in procedures for household members who are physically and mentally incapable of engaging in gainful employment.

(9) Employment Security will evaluate each IM-101 and determine the household member(s) which will be provided Job Search services.

b. Reregistration for reapplication is considered to be completed upon a determination the initial registration on file with MSES is less than six (6) months old, and the information is unchanged.

(1) Such determination will be made after a review by the caseworker of the response on the IM-101, Section C.

(2) If there is no change in information, MSES need not be notified.

(3) If there has been a change in employment status, MSES should be notified by IM-101 showing:

(a) Identity of registrant;

(b) Identity of household;

(c) Change which has occurred.

This report only provides current information to MSES. It does not change the date of initial registration. Work registration will require a new and complete IM-101 at the end of a six-month registration period.

3. Recording

a. For those household members who are not required to register, the worker will record the person's name and the reason for exemption on the IM-102 and any verification obtained, if verification is required.

b. For those household members who are required to register, the worker will record the person's name and the date registered on the IM-102.

4. Additional Requirements

Household members who are required to register must also:

a. Report for an interview to the Employment Security Office where he/she is registered upon reasonable request by MSES.

b. Respond to a request from the Employment Security Office requiring supplemental information regarding employment status or availability for work.

c. Report to an employer to whom he/she has been referred by MSES if the potential employment meets the suitability requirements described in paragraph D. of this section.

d. Accept a bona fide offer of suitable employment to which he/she is referred by MSES (see Suitability of Work).

e. Continue suitable employment to which he/she was referred by MSES until:

(1) The employment is no longer considered suitable, or

(2) The household member becomes exempt from work registration, or

(3) The household member is terminated from employment due to circumstances beyond his/her control. When a person is habitually late, has poor attendance, or his/her work is poor, and it appears this is deliberate, the worker must talk with the employer. If, in the worker's judgment, the household member caused the termination, the household will be ineligible. The case must be

4. After two reports by a household of non-delivery of either full or partial allotments in the mail (these may be reports of non-delivery of an original or a replacement allotment) the following procedures will be utilized.

   a. The State Office Mail Issuance Unit will automatically place the household on CERTIFIED MAIL method of delivery for a three month period or longer upon written request by the county office.

      Note! Certified Mail method of delivery includes returned request to the State Office Mail Issuance Unit and restricted delivery. Restricted delivery means that the envelope can only be received by and signed for by the person to which the envelope is addressed or their authorized agent designated on Postal Form 3849.

   b. Certified Mail replacements will not routinely be made until non-delivery/receipt has been verified.

   c. The County Office may send an IOC to the State Office Mail Issuance Unit to request that coupons be sent by certified mail when the automatic situation has not occurred and the County Office or the household has cause to justify certified mail method of delivery. The IOC must include households name, case number, bonus amount, type of payroll, and period of time certified mail is to be used.

   d. The County Office may also send an IOC to the MI Unit to request that coupons be sent to the county office for the household to pick up. The IOC shall include the same information as in c. above. This procedure shall be limited to special circumstances when the household has no permanent address or circumstances that prohibit receiving an signing for certified mail.

      Under these procedures if the household does not pick up their coupons during the period of intended use, the county office will return coupons to the State Office Mail Issuance Unit (P.O. Box 310, Jefferson City, MO 65102) on the first working day following the period of intended use for coupons.

      Note: If the State Office Mail Issuance Replacement Log reveals requests for replacements more than twice in a 6 month period or repeated requests from the same household, the household's future coupon allotment will automatically be sent by certified mail for a 3 month period or until the end of the certification period, whichever occurs first. If certified mail procedures are necessary, notification to the County Office will be recorded in the "Remarks" section of the IM-113. If the County Office wishes an extension beyond the 3 month period, an IOC must be sent to the Mail Issuance Unit requesting the extension.

D. ATP Card Issue Counties: St. Louis City, St. Louis County and Jackson County are designated as ATP Card issue counties. There will be no direct mail coupon issuance in these counties.

E. ATP Card Issue Counties - Mail Issuance Option: In these three (3) counties recipients have an option of obtaining their coupons from an issuer (post office, bank, and etc.) or:

Recipients may sign their ATP card and return it by mail to the State Office Mail Issuance Unit. The Mail Issuance Unit will, upon receipt of the properly signed ATP, mail the household their coupon allotment. Included with the coupon allotment will be an instructional notice should the recipient elect mail issue option in the following month.

This option is in effect in these three (3) counties with following restrictions:

The Mail Issuance Option is restricted to households comprised of elderly or disabled and homebounds in St. Louis City, and in selected zip codes in St. Louis County and Jackson County due to being designated as high risk mail areas the U.S. Postal Inspection Service. Restricted zip codes in St. Louis County and Jackson County are:

St. Louis County - 63114, 63121, 63130, 63133, 63134, 63135, 63136, 63140, and 62145.

Jackson County - 64106, 64124, 64127, 64111, 64109, 64128, and 64130.

XI. ISSUANCE PROCEDURES FOR HOMELESS PERSONS

If a homeless person is being approved for Food Stamps, the address of the county office will be entered on the IM-105. An IOC will be prepared requesting that the issuance be sent to the county office for the homeless person to pick up. If the county is a mail issuance county, this IOC will be sent to the Food Stamp Mail Issuance Unit. If the county is an ATP county, this IOC will be sent to the Food Stamp Data Management Unit. The address for both units is P.O. Box 310, Jefferson City, MO 65102-0301.

If the homeless person does not pick up his/her coupons, the coupons will be returned to the Food Stamp Mail Issuance Unit on the first working day following the period of intended use. If the homeless person does not pick up the ATP card, the ATP card will be returned to the Food Stamp Data Management Unit on the first working day following the period of intended use.

Lutheran Family
and Children's Services
of Missouri

TESTIMONY PREPARED FOR THE HOUSE SELECT COMMITTEE ON HUNGER

Making Foodstamps Available to the Homeless in Missouri

June 27, 1986

In the winter of 1983-84, staff at Lutheran Family and Children's Services of MO were beginning to serve more homeless clients than ever before. We were frustrated by the lack of public assistance--even food stamps--available for these vulnerable individuals and families. Although officially the policy in the Missouri manual governing food stamps indicated that a fixed residence was not a requirement, in reality an address was necessary prior to even making application, and there were no arrangements for other than mail delivery of the ATP card. Some caseworkers advised clients to purchase a P.O. Box, but for most destitute people this was an impossibility.

Because of our assocaition with the National Anti-Hunger Coalition we realized that the current practices in Missouri were against the Federal guidelines. Furthermore, the President's Task Force on Hunger report issued in early 1984 reiterated that food stamp accessibility for the homeless was a problem in many states.

In discussing the situation with program administrators at the state level they were unaware of actual violations. They insisted that no one was denied eligibility on the basis of homelessness. In the strictest sense this was true. However, they failed to realize that in many counties people without an address were not even allowed to apply in the first place so no determination of eligibility ever took place.

We identified a homeless client who was willing to work with us as a test case. I accompanied the client to the City of St. Louis Food Stamp Office. Initially clients are required to sign a waiting list with their name and address. It is at this point that they are told to come back when they have an address if they are homeless. We used the agency's address to get around this obstacle.

When we were meeting with the caseworker and he realized it was the agency's address and the client had filled out "no address" on the application he initially refused to take the application. I reminded him of the client's right to apply and that he needed a rejection in writing so that it could be appealed. I also had the phone numbers of administrators in St. Louis City and Jefferson City who had assured me discrimination against homeless was not occuring. I suggested he check with them before he threw us out. When he did,he came back and completed the application.

4625 Lindell Boulevard, Suite 501 • St. Louis, Missouri 63108 • 314-361-2121

The attached inter-office communication dated February 28, 1984 was the first clarification of policy to be issued by the state office on homelessness. The client was granted food stamps and arrangements were made so pick-up could occur at the Division office.

Although we now had a precedent case the office memo just dealt with one client. It was still difficult for the homeless to get their foot in the door. Lutheran Family and Children's Services (LFCS) convened an ad hoc Coalition of service providers working with the homeless to share our experience. Each agency took on the responsibility of walking with clients through the system and then report back.

The problems that emerged centered around the Departments inconsistent message to caseworkers on how to handle these cases. Because nothing was formally done to clarify policy, treatment depended heavily on who happened to be assigned to the case. Other issues involved how to establish the clients residency in the county (a legitimate eligibility factor) and how to determine whether a shelter was providing enough meals to make a person ineligible.

By May we were ready to meet with Division Staff to discuss how the process was going from both perspectives. It was agreed that collateral documentation of residency in the county, such as a clinic card, a letter from a shelter or social service agency, or a history at a previous address in the county could serve as verification. Using a letter from a shelter initially caused a Catch-22 because many shelters provide a light breakfast (usually coffee & rolls) and a late supper (usually soup or sandwiches) and this was used to deny eligibility on the basis of over 50% of meals served by an institution.

We argued with the state office effectively that a client had no guarantee of being in shelters night after night and was not a resident of an institution. They clarified the policy to read (Chapter IX, Sect II, page 8 - attached)

> "Provision of over 50% of three meals on one or more days during the issuance month will not cause a homeless person to be considered a resident of an institution unless that person is also living at the institution and the number of meals provided equal more than 50% throughout the issuance month."

On June 5 we had a press conference with the Division announcing availability of food stamps for the homeless (materials attached). At this time we formally re requested a statewide memo clarifying policy.

In July the attached memo went out to all offices clarifying policy. In August the enclosed manual revisions were made and distributed to include reminders and procedures for eligibility of homeless persons to receive food stamps.

Basically we were very pleased with the results of this cooperative effort. However, although accessibility has greatly improved, there are still difficulties reaching the homeless population. A recent analysis revealed that statewide only about 100 homeless cases were receiving food stamps. At this time we have no informatuon about rate of turnover or reasons for case-closing. One difficulty has been maintaining contact with clients for things such as job search requirements. One county office recently began advising homeless clients to call in once a week to see if they have any notice of action on their case.

Another group of concern are homeless families with children or families living in intolerable living conditions. When such a family applies for AFDC and Food stamps to try and stabilize their situation somewhat, they run the very real risk of losing their children to foster care instead. Because the caseworker is mandated to report any conditions (such as homelessness) that are detrimental to the children's well being, the state has grounds to remove the children for their protection. This means taxpayers are paying more expensive foster care costs and contributing to the break up of the family. Once the children are removed it is impossible for the mother to get AFDC so it becomes difficult to get them back. This Catch-22 could be eliminated by an emergency assistance grant, but this program is not funded in Missouri. Many vulnerable families do not apply for help from the state because they fear doing so will be exposing themselves to this possibility.

Thank you for your attention to the very real problems of hunger and homelessness in this country. We hope our experience can benefit others as well. Please feel free to contact us in the future if we can be of assistance.

Sara L. Barwinski A.C.S.W.
Lutheran Family and Children's Services

APPENDIX E

FOOD STAMPS

HOMELESS AND FOOD STAMPS

- **You do not need a permanent address** to receive food stamps. (362.100) If you spend a lot of time in an area, you should apply for food stamps at the welfare office covering that area. (362.100)

- You must verify your **identity.** To verify who you are, you will need identification, including but not limited to a birth certificate, driver's license, school or work I.D., voter registration card, a sworn statement from a person who knows you **or** a temporary identification form from general relief.

- You may be eligible for over-the-counter **Emergency Food Stamps** if you have $0 monthly net income and resources less than $100. If you have a monthly gross income less than $150 (and resources less than $100) you may get food stamps within 5 days. Your identity is the only thing you have to verify for emergency stamps. (365.800)

- All income should be verified (if you can): (363.200)
  - Day labor pool workers should **try** to provide 5 pay stubs or a letter from employer
  - If you don't have or can't get proof of your income, the food stamp worker should help you. The worker can do a home visit or make a "collateral contact", which is a phone call or letter to an employer, landlord, neighbor, or social service agency. (361.650)

- To receive food stamps you should be working or register for work. You do not have to work or register to work if: (362.300)
  a. you are under 18 or 60 years of age or older;
  b. you are physically or mentally unfit for work;
  c. you are an AFDC participant;
  d. you are receiving Unemployment Compensation;
  e. you are a parent (or caretaker) of a child under 12, or of a child under 18 in a household where another parent is registered for work or employed;
  f. you are in a treatment program for addicts or alcoholics;
  g. you are employed or self employed, working at least 30 hours/week or earning more than $100.50/week.

(continued on reverse)

- Homeless individuals who are either staying in individual shelters or obtaining their meals from a shelter ARE eligible to receive food stamp benefits. This is based on the fact that individual (adult) shelters are not institutions because there is no reasonable certainty that a bed and meal will be available from one day to the next and that the food served at the shelter does not always qualify as a meal. Homeless families living in family shelters and individual homeless adults living in mixed shelters may be eligible for food stamp benefits if the family or mixed shelter provides the shelter guest with less than 50% of their three (3) meals daily.

- If you don't have a mailing address, food stamps can be picked up at local welfare offices with the approval of the local director.

- Homeless individuals and homeless families should apply for food stamps at their local welfare office. Homeless individuals who reside in the City of Boston AND may be eligible for General Relief should apply for food stamps at the Hawkins Street Homeless Unit Food Stamp Office.

NOTE: ( ) The numbers next to statements are the regulation number in the state manual for food stamps. Everyone has the right to look at this information (360.500)

IF YOU NEED HELP OR AN ADVOCATE CALL:

PROJECT BREAD
FOOD STAMP HOTLINE
1-800-645-8333
14 Beacon St., Rm. 608, Boston, MA 02108

Funding provided by
Your Department of
Public Welfare
Commonwealth of Massachusetts

FOOD STAMPS ARE FOR THE HOMELESS, TOO

If you have tried to apply for food stamps but were turned away because you are homeless, call THE FOOD STAMP HOTLINE for help.

PROJECT BREAD
FOOD STAMP HOTLINE
1-800-645-8333

If you have *never* applied for food stamps, you may be eligible! CALL TODAY to find out how to apply.

PROJECT BREAD
FOOD STAMP HOTLINE
1-800-645-8333
14 Beacon St., Rm. 606, Boston, MA 02108

To: Shelters and Advocates for the Homeless
From: Project Bread Food Stamp Hotline
Re: Maximizing the Use of Food Stamps by Homeless Families and Individuals
Date: January 12, 1987

We have received questions from advocates about the options available to the homeless to use their Food Stamps. The attached Welfare memo confirms that the homeless can apply for Food Stamps without an address, without cooking facilities and without excessive verifications. Once a homeless person receives Food Stamps, she or he may still run into problems cashing the Food Stamps or purchasing food which does not require preparation, heating or storage. The following are some important points to remember.

°Food Stamps can be used for deli food, salad bars, and any other prepared or ready-to-go foods which are not hot when sold or sold to be heated on the store's premises (e.g., a sandwich which is sold to be heated in the store in a microwave). Federal rules prohibit stores from accepting Food Stamps for hot foods or foods sold to be heated by the store, as well as tobacco, alcohol, pet food and non-food items. However, no Food Stamp recipient should be barred from purchasing any other prepared or readily usable food available from any supermarket or convenience store.

°There are penalties for food stores and issuing agents (banks and stores that "cash out" the food stamp card) that abuse Food Stamp recipients. If a store has agreed to participate in the program, it cannot discriminate between recipients by refusing to accept Food Stamps of any individual patron. A store must give cash change up to 99 cents for any transaction less than the value of the Food Stamp presented. The store cannot refuse to give cash change to the Food Stamp patron. An issuing agent cannot charge for cashing out the Food Stamp (ATP) card or condition use of the Food Stamps in the store such as requiring that a percent of the Food Stamps be spent in the store.

°To report store abuses in the Food Stamp program such as refusing to allow purchase of prepared foods or harassment of recipients contact:

Food and Nutrition Services - District Office
1458 Hancock Street, Room 301
Quincy MA 02169
617/471-5884

PLEASE KEEP THE FOOD STAMP HOTLINE AWARE OF THESE ABUSES AS WELL. SEND US A COPY OF YOUR REPORT TO FNS.

Funding provided by Your Department of Public Welfare

A voice for the hungry

ADDITIONAL VIEWS

The Minority of the Select Committee on Hunger is alarmed at the growing problem of homelessness in the United States. It is a serious and complex problem which warrants responsible study and action by all levels of government and the private sector. We commend the Chairman for identifying this as a subject for Committee attention and we support efforts to study the subject further.

We also support several of the recommendations made by the Majority. There is a clear Federal responsibility to make sure that the food stamp and commodity distribution programs are operating effectively. Therefore, we support calls for increased Federal monitoring of State administration of these programs and for Federal technical assistance to be given to the States to clarify eligibility requirements.

We do not take the view that homelessness is a problem for only State and local governments and private organizations. Clearly, the Federal Government also has a responsibility to assist States and localities in addressing this problem. Hunger among the homeless is a multi-faceted problem, and one which requires a concerted and integrated approach using the resources of governments and the private voluntary charities.

Unfortunately, however, the Majority report is severely limited in its approach and thereby undermines the validity of its conclusions. Its contribution to the body of knowledge of the problem is limited because it relies on inadequate data. The report ignores the complexity of the homeless problem, assumes that Federal efforts are the best way to solve this problem, and uses faulty methodology on which to base its conclusions. Further, although the Majority gives much credence to the questionnaire results, this report is more a political document than a basis for collection of solid data with which policy makers could devise workable programs.

Although emergency food and shelter are necessary interim responses, we believe the Committee must make a more extensive effort to understand the underlying causes of homelessness. This effort should include collection of valid survey data and documentation of the existing body of knowledge already compiled by informed authorities.

Faulty Methodology

According to the introduction, this report is "the first national survey on the food assistance needs and food stamp participation of the homeless." However, because it relies on opinions from an unrepresentative and skewed "sample" of shelter operators, no valid conclusions can be drawn from this "survey." The Majority's use of the word "survey" is inappropriate because it implies a representative sample.

The Majority made no effort to select a representative sample of homeless shelter providers. Instead, it distributed questionnaires to large private nonprofit organizations whose members or affiliates were individual shelter providers. These organizations, in turn, distributed the questionnaires to shelter providers and asked these providers to distribute more of the questionnaires. Therefore, the Committee has no way of determining how many shelter providers received these questionnaires in the end. This makes it impossible to determine to what extent the selected sample of 140 shelter providers that answered the questionnaire is representative of homeless shelter providers, even for the single day used as a reference point for the survey. In short, no representative sample was drawn.

In addition, because we neither know the number of shelters to whom the questionnaire was sent nor the total number of shelter providers in the country, it is impossible to determine whether the 140 shelter providers constitute a "large and diverse population," as claimed by the Majority. Furthermore, the respondents were self-selected, which could mean that only certain kinds of shelter providers chose to respond to the survey. These providers may be very different from other shelter providers, and there is no way to know how representative they are.

The questionnaire poses some questions to shelter providers which are inappropriate for them to answer. For example, questions in sections B, C, and D ask for information about the number of persons receiving food stamps, and why persons are not receiving food stamps. These questions presuppose respondent expertise which may not exist. It is unlikely that a shelter provider knows all of the eligibility requirements and certification procedures for food stamps. Furthermore, those who answered this questionnaire most likely do not have enough information about each and every homeless person from their shelters who has applied for and been turned down for food stamps to answer these questions.

Many of the questions were written so that they could not be analyzed properly. For example, section D, question 2 asks for judgments on "lengthy delays," but does not define what a lengthy delay is. Is it 1 day, 1 week, or 2 weeks? How can such a question be analyzed? Similarly, section A, question 8 asks for "primary" sources of food, but does not define what primary means. For example, if a shelter has residents acquiring food from all sources, the provider may check all six boxes. Or, the provider may believe that the word primary means that a source has to be used by some percentage of residents before the box is checked. Because the question is open to wide interpretation, it is impossible to aggregate the answers to it in a meaningful way. These weaknesses are all the more frustrating to the Minority, because there may be serious problems associated with these issues. For example, there may in fact be unreasonable delays in the homeless receiving food stamps. Indeed, our hearings have provided some evidence to substantiate that. Unfortunately, if there are unreasonable delays, one would not know it from this Majority report due to its severe methodological limitations. delays of receipt of food stamps to eligible homeless persons would constitute a very serious problem, one which deserves a serious and scholarly approach.

Complexity of the Homeless Problem

This report tries to answer the question of who are the homeless, but gives an incomplete answer. Insufficient emphasis is given to the fact that those who are homeless are not a homogeneous group, and the reasons for their homelessness are numerous. Other studies and the Committee's own hearings indicate that today's homeless include those with alcohol, drug abuse, and mental health problems, women as well as men, families as well as single persons, people who have never been employed as well as people who are recently unemployed, and people of all races and ethnic backgrounds.

No one can deny that part of the reason for the increase in homelessness is due to a number of socio-economic trends. These include the results of the change in social and sexual mores of our society such as high divorce rates and teenage pregnancy; the economic dislocation of a deindustrialized economy; the loss of inexpensive housing because of urban redevelopment; and increased substance abuse. We emphasize that there are many causes of hunger among the homeless, and approaches must be varied. What works for one segment of the homeless population may be totally inappropriate for another.

However, another very important factor which this report fails to give the recognition it deserves is the policy of deinstitutionalization of the mentally ill. This social policy has had a substantial impact upon homelessness in this country.

The deinstitutionalization movement, begun in the 1960's and designed to create a more humane mental health system, has been a tragic failure. It has resulted in many mentally ill persons (both those who have been discharged from institutions and those who, because of this policy, have never been in institutions) ending up in the streets or in shelters and has fundamentally altered the charteristics of the homeless population.

Many of the homeless mentally ill can cope only to a limited extent with the demands of life. Most cannot live independently. Many mental health professionals are now recognizing that a number of severely disabled patients can survive and have their basic needs met only if they have a sufficiently structured community facility or other mechanism that provides support. Unfortunately, this support is not readily available in all communities. And, the shelter approach does not address the basic problems of the homeless mentally ill. Vital community services are necessary as are changes in the legal system that will facilitate involuntary treatment.

Because of the diversity of the homeless population, no single solution is applicable. It must be emphasized that the mentally-ill homeless must be treated differently from the other homeless persons. Our country has not yet come to grips with the failed policy of deinstitutionalization. Until we recognize that this dehumanizing policy, however well intentioned, has not worked, we will make little progress in helping this significant segment of the homeless population. Here the States must take the lead.

We must also point out that, although economic circumstances have contributed to the homeless problem, this kind of homeless-

ness is most often transitional. When persons who are marginally employed lose their jobs, they are often left with few alternatives for shelter. They need some assistance until they can get back on their feet, and with the help of Federal, State, and private programs, usually receive that assistance.

Homelessness due to such economic dislocations is serious, but it would be irresponsible to imply that this problem is similar to the problems faced by other types of homeless persons. Such oversimplification distorts the magnitude of the issue and makes appropriate solutions more difficult to discern.

Insufficient distinctions are made for the effect personal crises can have on the homeless problem. These crises include divorce, being released from jail or a hospital with no place to go, being stranded while travelling, domestic violence and health-related problems. This type of homelessness is also usually temporary and once personal problems are resolved, the need for emergency shelter tends to disappear simultaneously.

Emphasis on Federal Response

The Majority report is biased toward the view that the Federal Government can solve the problems of the homeless. However, the Federal Government alone cannot be successful. States and localities have the primary responsibility to deal with homeless substance abusers and the homeless mentally ill with locally based treatment centers. The Federal Government should ensure that the food stamp and commodity distribution programs are effective.

As we said at the outset of these views, the Federal Government has a responsibility, but there must be combined effort with local governments and the private voluntary charities. Due to the heterogeneous nature of the homeless population and its varied needs, this is the only way we will see progress. However, it is unreasonable to imply that the Federal effort has been minimal or that a greatly increased Federal effort by itself wil solve the intricate set of problems causing homelessness.

Recommendations

Several of the recommendations made in this report are worthy of support. As an example, increased monitoring of the States in their implementation of the Food Stamp Program and providing technical assistance to the States may very well increase the effectiveness of the program. Most of the recommendations do not rely on the questionnaire results for substantiation. This is fortuitous. As stated earlier, the Minority has no desire to deny the problems of homelessness in America. The Minority does, however, have a desire to see the problems receive the kind of careful study they deserve.

The report recommends increasing the amount of surplus commodities donated to soup kitchens and shelters. We are puzzled by this since such donations are already being made, and the Federal Government does not limit the amount of surplus commodities donated under the Charitable Institutions Program to a requesting State, as long as the State assures the Department that the commodities will not go to waste. (In fiscal year 1985, the Department

donated $165 million worth of bonus and entitlement commodities to charitable institutions.)

However, the report also offers more troubling recommendations.

The Majority recommended that Congress alter the definition of "Household" for determining food stamp eligibility. The current requirement that related persons living together be considered one food stamp household was added in 1981 and 1982 to reduce chances of fraud. In addition, this requirement was estimated to reduce program costs by about $100 million in fiscal years 1983–84. Congress imposed this requirement because of its belief that in the overwhelming number of cases, close relatives who live together also eat together. It does not seem unreasonable to presume that persons living in the same dwelling would share cooking facilities, utensils, and food, thereby deriving some efficiencies. The current definition is one of common sense.

The Majority has also recommended a new 3-year Federal grant program for health care and mental health services to the homeless. Such action may be necessary. Indeed, H.R. 558, due on the House Floor next week, contains a significant health title. We are concerned, however, at the lack of specificity in the Majority's recommendation. The recommendation is too vague. We have trouble supporting it because it is impossible to know exactly what it means.

Conclusion

Hunger among the homeless is a serious problem which demands the attention of this Committee. We are disappointed that the Majority report does not do proper service to this important problem. At the very least, the Federal responsibility is to ensure that the Food Stamp Program is implemented fully and that eligible homeless people are not denied the benefits due them. Further, we emphasize that hunger among the homeless is a complex problem requiring the combined efforts of all levels of government and private charities. The Committee's report does have merit, but that worth is much more limited than it needed to be. We would have hoped for a more scholarly effort. We encourage the Committee to continue its efforts to study these complicated issues related to hunger and homelessness.

Marge Roukema,
Vice Chairman.
Bill Emerson.
Sid Morrison.
Robert F. Smith.
Doug Bereuter.
Fred Upton.

ADDITIONAL VIEWS OF THE CHAIRMAN

While the body of this report stands on its own merits, I am compelled to include additional views on the Minority's misrepresentations of the design and intent of the report. As stated in the introduction, the Committee recognizes that food assistance alone is not the only solution to homelessness. However, because we are a Select Committee on Hunger our focus is justifiably on hunger issues.

Federal Response Needed

The need for an examination of the Federal solutions to hunger among the homeless is now critical as local governments and the private sector consistently report they are unable to keep up with the growing need for emergency food assistance among the poor and the homeless. It is clearly a Federal responsibility that all persons have access to an adequate diet regardless of their social or economic conditions. Because the Food Stamp Program is the major Federal food assistance program designed to prevent hunger among low-income persons, the report's findings and recommendations focus on the accessibility and effectiveness of this program for homeless persons.

Complexity of Homeless Problem Does Not Affect Need for Food Aid

I would like to stress that I share the Minority's concern for the complexity and diversity of the homeless population. In fact, the introduction and many sections of the report highlight these points. The need for an investigation of the food stamp participation of this high-risk population, however, is not affected by the varied socioeconomic circumstances of homeless individuals. The Food Stamp Program is a means tested program designed to assist low-income persons regardless of their individual or social circumstances.

Optimal Methodology Chosen

I would also like to address the Minority's concerns regarding the methodology of the study. Rather than characterize the study's survey methodology as "faulty" and failing to be "large and diverse", the Minority must acknowledge the inevitable methodological difficulties of acquiring information on the daily problems of the homeless. In spite of these difficulties, we have been successful in collecting much needed information on the food assistance needs of this vulnerable population group. Our data confirms several existing reports, including a report by the U.S. Department of Health and Human Services, which stated that most homeless persons do

not receive food stamps and recommended that the Federal Government take a role in improving the participation of the homeless including outreach and removing impediments to participation.

The Committee requested information from the U.S. Department of Agriculture (USDA) on the participation rate and reasons for nonparticipation among eligible homeless persons in Federal food programs. Unfortunately, we were informed by Mr. John Bode, Assistant Secretary for Food and Consumer Services at USDA, that: "It is not currently feasible (for the Department) to collect such data." USDA, more than any other organization, is in the position to gather information on the extent of hunger among vulnerable population groups, on their participation rate in Federal food programs, and on barriers to their effective participation in these programs.

I would like to emphasize that Congress currently provides USDA with several million dollars to research the effectiveness of Federal food programs they administer. Over the past 5 years, however, USDA has not conducted any studies to determine the effectiveness of the Food Stamp Program in meeting the needs of population groups that are recognized to be vulnerable to hunger, such as the homeless.

After reviewing the existing national, State, and local reports and congressional hearings on homelessness, and learning that USDA had no data on the food program participation of the homeless, the Committee determined that first hand data was needed. This would permit us to make practical and effective recommendations to alleviate hunger among the homeless. Budget constraints and practicality prevented the Committee from holding a plethora of hearings across the Nation to receive testimony on this issue; thus, we designed a survey and compiled the results into this report, along with the findings of the previous research and testimony provided at congressional hearings.

As the Minority views note, it is extremely difficult to conduct a statistically representative survey of the homeless population because neither the number of homeless persons nor the number of facilities serving this population group nationwide is known. Hence, the Committee survey was designed to provide descriptive rather than "representative" data.

The best data on the food assistance needs of the homeless could, ideally, be collected from questionnaires distributed directly to homeless persons. However, directly interviewing a large number of homeless persons from many locations would not have been practical for the Committee.

Despite the methodological and informational barriers, the Committee designed a survey to gather the best possible information on the food assistance needs of the homeless. The questionnaire was distributed to shelter managers across the Nation. Because these individuals assist homeless persons on a day-to-day basis, they are more likely than anyone else to know their clients' food assistance needs and food stamp status. They would also be aware of any difficulties experienced in attempting to acquire food assistance. The survey responses gathered from 140 shelter managers who work with homeless individuals and families in 24 States should be viewed as expert testimony from 140 qualified witnesses.

Long-Term Solutions Needed Beyond Administrative Changes to Federal Food Programs

I am disappointed that the Minority differs with many of the report's legislative recommendations which go beyond administrative recommendations to: (1) improve access to food assistance for the homeless and those at risk of homelessness; (2) provide additional emergency services; and, (3) address long-term solutions to poverty, lack of affordable housing and the inadequate supply of community-based services for the chronically mentally ill.

I am specifically concerned about the Minority's comments regarding recommendations to remove the barrier of the Food Stamp Act's current "household" definition that prevent children from claiming separate household status from their parents when they reside together, even if they do not purchase and prepare food together. Testimony presented before the Select Committee reveals that this current rule adversely affects the "hidden homeless" who must double- or triple-up rather than live on the street or in a shelter.

At a February 25, 1987 Select Committee hearing, entitled "Hunger and Homelessness", Assistant Secretary Bode stated that USDA believes the current "household" definition is appropriate because it requires extended families to provide food assistance to their low-income relatives. However, testimony at Select Committee hearings and documents provided in court suits consistently reveal that while extended families may provide temporary shelter to their homeless relatives they cannot or do not necessarily share resources for food. I remain strongly in support of the report's recommendation to alter the definition of the household to assure food assistance is available to the growing number of "hidden homeless" in our Nation.

Conclusion

It is my wish, and one which is shared by many of the Select Committee Members, that we can put behind us our political differences and work together in presenting to the Congress and to the American public our research and findings on the critical issue of hunger among the homeless. This, the first of the Committee's domestic reports, clearly meets one of the objectives intended by Congress in authorizing the Select Committee on Hunger. We are charged with investigating the multiple causes and consequences of hunger and malnutrition in the United States and making practical recommendations which may be utilized by the many standing committees of jurisdiction over programs and policies affecting all aspects of poverty and hunger.

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